IN THE SUPREME COURT OF THE UNITED STATES

## No. 18-1109

## JAMES ERIN MCKINNEY, PETITIONER

v.

## STATE OF ARIZONA, RESPONDENT

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Amy Mason Saharia, counsel for the American Civil Liberties Union and ACLU Foundation of Arizona, and a member of the Bar of this Court, certify that the Brief for American Civil Liberties Union and ACLU Foundation of Arizona as Amici Curiae in Support of Petitioner in the above-captioned case contains 7,991 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

> <u>/s/ Amy Saharia</u> Amy Mason Saharia

August 28, 2019