No. 18-1109

In the Supreme Court of the United States

James Erin McKinney Petitioner,

v.

State of Arizona, *Respondent*.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that this Amicus Brief in Support of Petitioner contains 2,920 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 28, 2019.

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