

No. 18-485

IN THE
Supreme Court of the United States

EDWARD G. McDONOUGH,

Petitioner,

v.

YOUEL SMITH, INDIVIDUALLY AND AS SPECIAL DISTRICT
ATTORNEY FOR THE COUNTY OF RENSSELAER,
NEW YORK, AKA TREY SMITH,

Respondent.

**On Writ of Certiorari to the
United States Court of Appeals
for the Second Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Benjamin Gruenstein, a member of the Bar of this Court, certify that the Brief of The Innocence Network As Amicus Curiae Supporting Petitioner contains 8,148 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

Dated: March 4, 2019.

____/s/ Benjamin Gruenstein____
Benjamin Gruenstein

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