IN THE Supreme Court of the United States

JAMES K. KAHLER,

Petitioner,

v. Kansas,

Respondent.

On Writ of Certiorari to the Kansas Supreme Court

BRIEF OF AMICUS CURIAE NATIONAL ASSOCIATION OF CRIMINAL DEFENSE LAWYERS IN SUPPORT OF PETITIONER

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

BARBARA E. BERGMAN

Co-Chair, Amicus

Curiae Committee

NATIONAL ASSOCIATION OF

CRIMINAL DEFENSE LAWYERS
1201 East Speedway Blvd.

Tucson, AZ 85721

JONATHAN L. MARCUS
Counsel of Record
BRENDAN B. GANTS
DANIEL B. O'CONNELL
JEONGU GIM
1440 New York Avenue, NW
Washington, DC 20005
(202) 371-7000
Jonathan.Marcus@skadden.com

Counsel for Amicus Curiae

Certificate of Compliance With Word Limitations

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* National Association of Criminal Defense Lawyers in Support of Petitioner complies with the word limit set forth in Supreme Court Rule 33.1(g)(xii) as it contains 5,882 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 June 7, 2019

Jonathan L. Marcus

Counsel of Record for Amicus Curiae National Association of Criminal Defense Lawyers