

No. 18-809

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**In the Supreme Court of the United States**

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CURTIS T. LOVELACE,  
*Petitioner,*

v.

PEOPLE OF THE STATE OF ILLINOIS,  
*Respondent.*

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**ON PETITION FOR A WRIT OF CERTIORARI TO THE  
APPELLATE COURT OF ILLINOIS, FOURTH DISTRICT**

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**CERTIFICATE OF WORD COUNT OF BRIEF  
OF THE NATIONAL ASSOCIATION OF  
CRIMINAL DEFENSE LAWYERS AS *AMICUS*  
*CURIAE* IN SUPPORT OF PETITIONER**

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Jeffrey T. Green  
*Co-chair*, NACDL Amicus  
Committee  
1501 K Street, N.W.  
Washington, DC 20005  
(202) 736-8291

Theresa Wardon Benz  
H. Camille Papini-Chapla  
Shawn K. Neal  
Wheeler Trigg O'Donnell LLP  
370 17<sup>th</sup> Street, Suite 4500  
Denver, Colorado 80202  
(303) 244-1800

*Attorneys for the National Association  
of Criminal Defense Lawyers  
in Support of Petition for a Writ of Certiorari*

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## **CERTIFICATE OF WORD COUNT**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,819 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Respectfully submitted,

*s/ Theresa Wardon Benz*

THERESA WARDON BENZ

COUNSEL OF RECORD

WHEELER TRIGG

O'DONNELL LLP

370 17<sup>th</sup> Street, Suite 4500

Denver, Colorado 80202

(303) 244-1800

benz@wtotrial.com

*Attorney for Amicus Curiae*

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