

IN THE  
**Supreme Court of the United States**

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VICTOR THOMAS,  
*Petitioner,*  
v.  
NEW YORK,  
*Respondent.*

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**On Petition for Writ of Certiorari to the  
New York Court of Appeals**

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**MOTION FOR LEAVE TO FILE BRIEF AS  
AMICUS CURIAE AND BRIEF OF THE  
CATO INSTITUTE AS AMICUS CURIAE  
IN SUPPORT OF THE PETITION**

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the brief contains 3,244 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

The motion contained within this publication has 313 words.

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

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Executed on March 20, 2020.

  
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Colin Casey Hogan  
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