In The Supreme Court of the United States

Kari Janae Phipps,

Petitioner,

v.

STATE OF IDAHO,

Respondent.

On Petition for a Writ of Certiorari to the Supreme Court of Idaho

PETITION FOR A WRIT OF CERTIORAI

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Amir H. Ali, certify that the document contains 2,698 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.

August 26, 2020

/s/ Amir H. Ali Amir H. Ali Counsel of Record