No. 19-164

IN THE Supreme Court of the United States

DAVID SAMARRIPA, ET AL.,

Petitioners,

v.

GREGORY KIZZIAH, WARDEN, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief Amici Curiae of Sixth Circuit Appointed Counsel in Support of Petitioners in Samarripa v. Kizziah, No. 19-164, complies with the word limitations, as it contains 4,306 words.

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

Date: September 4, 2019

Louis A. Chaiten