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No. 19-169

JANE DOE, Petitioner, v. IOWA, Respondent.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF AMICUS CURIAE PUBLIC DEFENDER ASSOCIATION OF IOWA IN SUPPORT OF PETITIONER JANE DOE in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 4098 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 9th day of September, 2019. I am duly authorized under the laws of the State of Nebraska to administer oaths.

PATRICIA BILLOTTE General Notary State of Nebraska My Commission Expires Nov 24, 2020

Notary Public

Affiant

E. Billotte

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