## IN THE

## Supreme Court of the United States

GOVERNOR OF DELAWARE,

Petitioner,

v. James R. Adams,

Respondent.

On Writ of Certiorari to the United States Court of Appeals for the Third Circuit

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Richard W. Clary, a member of the Bar of this Court, certify that the Brief of the Brennan Center for Justice at NYU School of Law as *Amicus Curiae* Supporting Petitioner contains 7,978 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

Dated: January 28, 2020.

/s/ Richard W. Clary Richard W. Clary

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