

## CERTIFICATE OF COMPLIANCE

No. 19-309

JOHN C. CARNEY, GOVERNOR OF DELAWARE,

Petitioner,

V.

JAMES R. ADAMS,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Cato Institute in Support of Respondent contains 3,660 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

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

Executed on February 26, 2020.

Donna J. Wolf

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Sworn to and subscribed before me by said Affiant on the date designated below.

Date: Jely 26, 7c20

Notary Public

[seal]

JULIE ANNE KERSHNER Notary Public, State of Ohio My Commission Expires February 21, 2023