No. 19-309

IN THE SUPREME COURT OF THE UNITED STATES

JOHN C. CARNEY, GOVERNOR OF DELAWARE,

Petitioner,

v.

JAMES R. ADAMS,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the accompanying Brief of Amicus Curiae Public Citizen in Support of Respondent contains 7,311 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on February 25, 2020.

Acot I Ulan

SCOTT L. NELSON PUBLIC CITIZEN LITIGATION GROUP 1600 20th Street NW Washington, DC 20009 202-588-1000