## CERTIFICATE OF COMPLIANCE

Nos. 19-840, 19-1019

In the Supreme Court of the United States

State of California, et al., Petitioners, v.

State of Texas, et al., Respondents.

State of Texas, et al., Petitioner, v. State of California, et al., Respondents.

As required by Supreme Court Rule 33.1(h), I, Jeremy Cooper Doerre, Counsel of Record for Amicus Curiae Jeremy C. Doerre and a member of the Bar of this Court, do hereby certify that the Brief of Amicus Curiae Jeremy C. Doerre Suggesting Reversal contains 4,128 words, excluding the parts of the document exempted by Supreme Court Rule 33.1(d), and complies with the word limitations set out in Rule 33.1(g).

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

Executed on May 12, 2020

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