IN THE SUPREME COURT OF THE UNITED STATES

 ${\bf RUBEN\ GUTIERREZ},$

Petitioner,

v.

Luis Saenz, et al., Respondents.

CERTIFICATE OF WORD COUNT

As required by the Supreme Court Rule 33.1(h), I certify that the Petitioner's Supplemental Brief was prepared using Certury 12-point typeface and contains 2,013 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). The brief therefore complies with the 3000 word limit set forth in Supreme Court Rule 33.1(g). This certificate was prepared in reliance on the word-count function of the word processing system used to prepare the document.

I declare under penalty of permury that the foreoing is true and correct.

Executed on November 30, 2020.

Respectfully submitted,

/s/ Matthew C. Lawry

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