IN THE

## Supreme Court of the United States

DAVID SHINN, et al.,

Petitioners,

v.

DAVID MARTINEZ RAMIREZ and BARRY LEE JONES, Respondents.

> ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Alan E. Schoenfeld, a member of the bar of this Court, certify that the accompanying Brief for The American Bar Association as Amicus Curiae Supporting Respondents contains 5,852 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on September 20, 2021.

Alan E Schoenfold/RMD

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