

No. 20-1060

JOSÉ L. OLIVA,

Petitioner,

v.

MARIO J. NIVAR, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Professor Seth W. Stoughton in Support of Petitioner contains 5,985 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

February 9, 2021

/s/ Randall C. Smith
Counsel of Record