

**IN THE SUPREME COURT OF THE UNITED STATES**

No. 20-1060

Jose Oliva,  
*Petitioner,*

v.

Mario Nivar *et al.*,  
*Respondents.*

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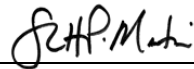
**CERTIFICATE OF COMPLIANCE**

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Pursuant to this Court's Rule 33.1(x), I hereby certify that the accompanying Brief for Professor Peter H. Schuck as *Amicus Curiae* in Support of Petitioner contains 2864 words, excluding the parts of the document exempted by Rule 33.1(d).

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

Executed on February 23, 2021



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