

No. 20-1060

IN THE
Supreme Court of the United States

JOSÉ OLIVA,

Petitioner,

v.

MARIO NIVAR, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of the American Civil Liberties Union, Cato Institute, DKT Liberty Project, and Law Enforcement Action Partnership as *Amici Curiae* in Support of Petitioner contains 4,877 words and complies with the word limitation established by Rule 33.1(g)(x) of the Rule of this Court.

Dated: March 3, 2021



Theane Evangelis