Rule 33.1(h) Certificate of Compliance

No.20-1066

In The Supreme Court of the United States

ASHLYN HOGGARD,

 $\begin{array}{c} Petitioner, \\ \text{v.} \\ \text{RON RHODES, ET AL.,} \end{array}$

Respondents.

I certify that the BRIEF OF AMICUS CURIAE CENTER FOR AMERICAN LIBERTY IN SUPPORT OF PETITIONER in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in new Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 2,649 words, excluding those parts of the document exempted by Rule 33.1(d).

March 8, 20201

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