

No. 21-\_\_\_\_\_

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**CERTIFICATE OF COMPLIANCE**

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MICHAEL ANTHONY CASILLAS,  
*Petitioner,*

v.

STATE OF MINNESOTA,  
*Respondent.*

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As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 6,559 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

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

Executed on May 12, 2021

/s/ John Arechigo  
John Thomas Arechigo  
*Counsel of Record*  
ARECHIGO & STOKKA, P.A  
332 Minnesota Street  
Suite W1080  
St. Paul, MN 55101  
651-222-6603  
john@arechigo-stokka.com

*Counsel for Petitioner*

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