## IN THE

## Supreme Court of the United States

ARTHUR GREGORY LANGE,

Petitioner,

v. California,

Respondent.

On Writ of Certiorari to the Court of Appeal of the State of California, First Appellate District

## REPLY BRIEF FOR PETITIONER

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,904 words, excluding the parts of the document 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 February 5, 2021.

Colin Casey Hogan

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