

No. 20-5082

In the Supreme Court of the United States

JOE EDWARD JOHNSON, *Petitioner*,

v.

STATE OF CALIFORNIA, *Respondent*.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition contains 7,861 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.

Dated: October 16, 2020
Respectfully submitted,

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