IN THE

Supreme Court of the United States

RICHARD BERNARD MOORE,

Petitioner,

v.

BRYAN P. STIRLING, Commissioner, South Carolina Department of Corrections, MICHAEL STEPHAN, Warden of Broad River Correctional Institution,

Respondents.

On Petition for Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* of the National Association of Criminal Defense Lawyers in Support of Petitioner contains 5,915 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d), in compliance with the word limit set forth in Supreme Court Rule 33.1(g)(x).

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

Executed on the 2nd of October, 2020.

/s/ Jonathan L. Marcus Jonathan L. Marcus