

No. 20-559

IN THE
Supreme Court of the United States

JANE DOE,

Petitioner,

v.

UNITED STATES OF AMERICA,

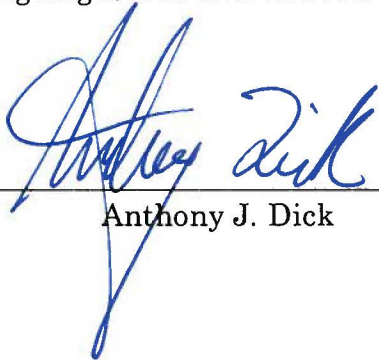
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief of Federal Courts and Constitutional Law Professors as *Amici Curiae* in Support of Petitioner, in *Doe v. United States*, No. 20-559, complies with the word limitations, as it contains 5,999 words.

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

Date: November 30, 2020



Anthony J. Dick