

*In the Supreme Court of the United States*

---

RODNEY CARLISLE, JR.,

*Petitioner,*

v.

COMMONWEALTH OF KENTUCKY,

*Respondent.*

**CERTIFICATE OF WORD COUNT**

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of *Amici Curiae* Professors of Criminal Law and Criminal Procedure in Support of Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 2,619 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

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

DATED this 21<sup>st</sup> day of December, 2020.

/s/ Michael A. Vatis

Michael A. Vatis  
Steptoe & Johnson LLP  
1114 Avenue of the Americas  
New York, New York 10036  
(212) 506-3900  
mvatis@steptoe.com

Counsel for *Amici Curiae*