In the

Supreme Court of the United States

LE ROY TORRES,

Petitioner,

V.

TEXAS DEPARTMENT OF PUBLIC SAFETY,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the Supreme Court Bar and, as required by Supreme Court Rules 33.1(h) and 33.1(g), the BRIEF OF AMICI CURIAE PHILIP C. BOBBITT, MICHAEL C. DORF, AND H. JEFFERSON POWELL IN SUPPORT OF PETITION FOR CERTIORARI contains 5,739 words, excluding the parts that are exempted by Supreme Court Rule.

Dated: December 23, 2020 Respectfully submitted,

Arn Jacobsen