

**In the Supreme Court of the United States**

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MICHAEL ANTHONY ROBBINS, *Petitioner*,

v.

THE PEOPLE OF THE STATE OF CALIFORNIA,  
*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition contains 4,147 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: January 28, 2021

Respectfully submitted,

XAVIER BECERRA  
Attorney General of California

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