

In the Supreme Court of the United States

MICHAEL ANTHONY ROBBINS, *Petitioner*,

v.

THE PEOPLE OF THE STATE OF CALIFORNIA,
Respondent.

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

S/ SETH M. FRIEDMAN
*SETH M. FRIEDMAN
Deputy Attorney General

**Counsel of Record*
**Counsel for Respondent*