In the Supreme Court of the United States

RAYMOND HOLLOWAY, JR.,

Petitioner,

v.

JEFFREY A. ROSEN, ACTING ATTORNEY GENERAL, ET AL.,

Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Brief of Amicus Curiae The American Constitutional Rights Union In Support Of Petitioners in Case No. 20-782 contains 3,291 words, excluding 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.

Executed on the 6th day of January 2021.

JOHN J. PARK, JR.

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