

No. 20-8363

In the Supreme Court of the United States

OUTHORM ROS, *Petitioner*,

v.

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 4,406 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: October 15, 2021
Respectfully submitted,

ROB BONTA
Attorney General of California

/s/ MATTHEW MULFORD
MATTHEW MULFORD
Deputy Attorney General

**Counsel of Record*

Counsel for Respondent

SD2021801694
83088762.docx