No. 20-911

IN THE

Supreme Court of the United States

MICHAEL JACKSON,

Petitioner,

v.

DON HUDSON, WARDEN,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for Jonathan F. Mitchell and Adam K. Mortara as *Amici Curiae* in Support of Respondent in *Jackson v. Hudson*, No. 20-911, complies with the word limitations as it contains 5,824 words.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Eric Tung

Date: May 10, 2021

Eric Tung