SUPREME COURT OF THE UNITED STATES

No. 20-937

ROBERT ANDREWS,

Petitioner,

v.

STATE OF NEW JERSEY,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition contains 7,789 words, excluding the parts of the document that are exempted by Supreme Court 33.1(d).

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

Seilin

JEREMY M. FEIGENBAUM

Date: April 2, 2021