IN THE

Supreme Court of the United States

RAYMOND RODRÍGUEZ-RIVERA, Petitioner.

υ.

UNITED STATES OF AMERICA, Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FIRST CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Massachusetts Association of Criminal Defense Lawyers in Support of Raymond Rodríguez-Rivera's Petition for a Writ of Certiorari in case No. 21-143 contains 5946 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 31st day of August, 2021.

/S/CHRISTOPHER ESCOBEDO HART

CHRISTOPHER ESCOBEDO HART

Counsel of Record

ANTHONY D. MIRENDA

PETER ELLIS

LAURA D. GRADEL

FOLEY HOAG LLP

Seaport West

155 Seaport Boulevard

Boston, MA 02210

(617) 832-1000

ADM@foleyhoag.com

Counsel for Amicus Curiae

Dated: August 31, 2021