IN THE

Supreme Court of the United States

ARELI ESCOBAR,

Petitioner,

v.

STATE OF TEXAS,

Respondent.

On Petition for a Writ of Certiorari to the Texas Court of Criminal Appeals

CERTIFICATE OF COMPLIANCE

I am a member of the Bar of this Court, and as required by Supreme Court Rule 33.1(h), I certify this 26th day of July, 2022, that the Brief of the Innocence Network and the Center for Integrity in Forensic Sciences, Inc. as *Amici Curiae* in Support of Petitioner contains 5,891 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

July 26, 2022

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