In The

Supreme Court of the United States

KEVIN BYRD,

Petitioner,

v. Ray Lamb,

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Fifth Circuit

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATION

In accordance with Supreme Court Rule 33.1(h), the undersigned certifies that the Motion for Leave and Brief of Peter Schuck as Amicus Curiae in Support of Petitioner complies with the applicable word limit set forth in Rule 33.1(g): Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 3519 words. (Consistent with Rule 33.1(d), the undersigned is relying on the word count utility in Microsoft Word (Microsoft 365), the word processing program used to prepare the brief.

September 4, 2021

Respectfully submitted,

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