

IN THE
Supreme Court of the United States

STATE OF OKLAHOMA,

Petitioner,

v.

ARNOLD DEAN HOWELL,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Amicus Curiae Muscogee (Creek) Nation in Support of Respondent contains 5,966 words, excluding the 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 October 14, 2021.

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