

SUPREME COURT OF THE UNITED STATES

No. 21-374

STEVEN EDWARD STRUVE,

Petitioner,

v.

STATE OF IOWA,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition in the above-entitled case complies with the typeface requirements of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12-point, and this brief contains 4607 words, excluding the parts exempted by Supreme Court Rule 33.1(d).

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


Kevin Cmelik

Subscribed and sworn before me
on November 16, 2021

