## IN THE SUPREME COURT OF THE UNITED STATES

\_\_\_\_

No. 21-429

STATE OF OKLAHOMA, PETITIONER

V.

## VICTOR MANUEL CASTRO-HUERTA

\_\_\_\_\_

## CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Kannon K. Shanmugam, counsel for petitioner and a member of the Bar of this Court, certify that the Brief for the Petitioner in the above-captioned case contains 12,916 words, excluding the portions that are exempted by Rule 33.1(d).

Kannon K. Shanmugam

February 28, 2021