## IN THE

## Supreme Court of the United States

OKLAHOMA,

Petitioner,

v.

VICTOR MANUEL CASTRO-HUERTA,

Respondent.

ON WRIT OF CERTIORARI TO THE COURT OF CRIMINAL APPEALS OF OKLAHOMA

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 4th day of April 2022, that the Brief of the National Association of Criminal Defense Lawyers as Amicus Curiae in Support of Respondent in the above-captioned case contains 4,714 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Michael R. Dreeben Michael R. Dreeben