

IN THE  
**Supreme Court of the United States**

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MIGUEL ANGEL SANTANA,  
*Petitioner,*  
v.  
STATE OF MARYLAND,  
*Respondent.*

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On Petition for a Writ of Certiorari  
to the Maryland Court of Special Appeals

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 7,360 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

September 20, 2021

  
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