

No. 21-440

IN THE
Supreme Court of the United States

MIGUEL ANGEL SANTANA,

Petitioner,

v.

STATE OF MARYLAND,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE
MARYLAND COURT OF SPECIAL APPEALS

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Gregory H. Lantier, a member of the bar of this Court, certify that the accompanying Brief of *Amicus Curiae* The Center on the Administration of Criminal Law at NYU School of Law in Support of Petitioner contains 3,877 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on October 22, 2021.



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