

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

MIGUEL ANGEL SANTANA,  
*Petitioner,*

v.

STATE OF MARYLAND,  
*Respondent.*

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**CERTIFICATE OF COMPLIANCE WITH RULE 33.1**

As required by Supreme Court Rule 33.1(h), I certify that the **Brief of *Amici Curiae* Due Process Institute, National Association for Public Defense, The Cato Institute, and Innocence Project in Support of Petitioner** contains 5,965 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on October 22, 2021.



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