

No. 21-440

IN THE
Supreme Court of the United States

MIGUEL ANGEL SANTANA,
Petitioner,

v.

STATE OF MARYLAND,
Respondent.

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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