CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Amicus Brief contains 1,810 words, excluding the parts of the document that are exempted by Rule 33.1(d).

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

Respectfully submitted,

Adam Lamparello Counsel of Record for Amici Curiae

Adam Lamparello Assistant Professor Georgia College and State University 231West Hancock Street Milledgeville, Georgia 31061 adam.lamparello@gcsu.edu

Charles E. MacLean Associate Professor Metropolitan State University 700 East Seventh Street Saint Paul, Minnesota 55106 Chuck.MacLean@MetroState.edu

Brian Owsley Associate Professor of Law University of North Texas-Dallas College of Law 106 South Harwood Street Dallas, Texas 75201 brian.owsley@untdallas.edu