

No. 21-5711

**In the Supreme Court of the United States**

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IRVING ALEXANDER RAMIREZ, *Petitioner*,

v.

STATE OF CALIFORNIA, *Respondent*.

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition contains 4,221 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.

Dated: November 18, 2021

Respectfully submitted,

ROB BONTA  
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*/s/ Elizabeth W. Hereford*

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*\*Counsel of Record*

*\*Counsel for Respondent*