

## CERTIFICATE OF WORD COUNT

I hereby certify, in accordance with Supreme Court Rules that the State of Texas's Opposition to Petition for a Writ of Certiorari in case number 21-6001, styled *Andrus v. Texas*, is within the requisite word and page limits set by the Court for such documents in that the document in page length is 37 pages counting those items required to be under the 40 page limit.

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