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December 27, 2021

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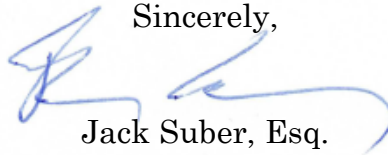
RE NO. 21-771: JUSTIN HERRERA V. THERESA CLEVELAND, ET AL.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae The Howard University School of Law Civil Rights Clinic referenced above contains **2,632** 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.

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 27th day of December 2021.

