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January 6, 2022

Clerk
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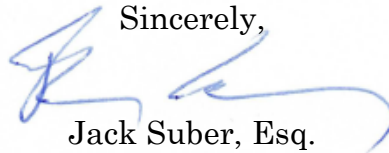
RE NO. 21-846: JOHN MONTENEGRO CRUZ V. ARIZONA

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Habeas Scholars referenced above contains **5,246** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d) but including all words in Appendix B.

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

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 6th day of January 2022.

