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June 21, 2022

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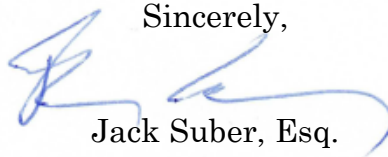
**RE NO. 21-846: JOHN MONTENEGRO CRUZ V. STATE OF ARIZONA**

Dear Sir or Madam:

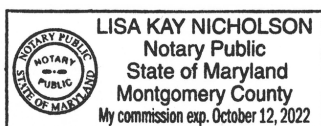
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Federal Courts Scholars referenced above contains **4,990** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d) but including the list of *Amici* in the Appendix.

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

Sincerely,



Jack Suber, Esq.  
Principal



Sworn and subscribed before me this 21st day of June 2022.

