## In the Supreme Court of the United States

JOHN MONTENEGRO CRUZ, PETITIONER

v.

STATE OF ARIZONA, RESPONDENT

ON WRIT OF CERTIORARI TO THE SUPREME COURT OF ARIZONA

## BRIEF OF JONATHAN F. MITCHELL AND ADAM K. MORTARA AS AMICI CURIAE IN SUPPORT OF RESPONDENT

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As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amici Curiae* of Jonathan F. Mitchell and Adam K. Mortara in Support of Respondent contains 5,690 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 19, 2022.

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