## CERTIFICATE OF WORD COUNT

Case No. 22-418

Case Name:

Gene Deveraux v. State of Montana

Document Title:

Brief of Amicus Curiae Montana Association of Criminal Defense Lawyers, In Support Of Petition

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of Amicus Curiae Montana Association of Criminal Defense Lawyers complies with the applicable 6,000 word limitation. The brief was prepared using Century 12-point typeface, contains 2,449 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word processing system (Microsoft Word) used to prepare the document.

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

DATED this 4th day of December 2022.

/s/ Michael J. Sherwood

MICHAEL J. SHERWOOD 1920 Alvina Drive Missoula, Montana 59802 mike@mjsherwoodlaw.com (406) 240-2749