No. 22-430

Charles Barton and Nathan Sanders, *Petitioners*,

v.

State of Texas, Respondent.

CERTIFICATE OF COMPLIANCE WITH THE WORD LIMITATIONS

I, Anthony G. Lantagne, hereby certify that the above referenced BRIEF OF THE RUTHERFORD INSTITUTE AS *AMICUS CURIAE* IN SUPPORT OF PETITIONERS, as indicated by the word count feature of MS Word and including footnotes but excluding those parts enumerated for exclusion under the rules, contains 3,516 words.

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

Executed on this 8th day of December, 2022.

Anthony G. Lantagne

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(804) 644-0477

COMMONWEALTH OF VIRGINIA)	
CITY OF RICHMOND)	to-wit:

Anthony G. Lantagne appeared before me this <u>8th</u> day of December, 2022, and attested that the foregoing certificate is true and exact to the best of his knowledge and belief.

DEANDR'

Keiona Redd