In the Supreme Court of the United States

JUAN VILLA RAMIREZ, Petitioner,

v.

THE PEOPLE OF THE STATE OF CALIFORNIA, Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF IN OPPOSITION contains 1,998 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Dated: January 27, 2023

Respectfully submitted,

ROB BONTA Attorney General of California

/s/ Sean M. McCoy

SEAN M. McCoy Deputy Attorney General

Counsel of Record Counsel for Respondent

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