

No. 22-6655

IN THE SUPREME COURT
OF THE UNITED STATES

THEODORE WASHINGTON,
Petitioner,

v.

RYAN THORNELL, Director, Arizona Department
of Corrections, Rehabilitation and Reentry,
Respondent.

*On Petition for a Writ of Certiorari to the
United States Court of Appeals for the
Ninth Circuit*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae National Association of Criminal Defense Lawyers in this case contains 1038 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. Executed on February 23, 2023.



JOHN D. CLINE

Law Office of
John D. Cline
600 Stewart Street,
Suite 400
Seattle, WA 98101
(360) 320-6435
cline@johndclinelaw.com