CERTIFICATE OF COMPLIANCE

No. 22-77

DAVID BROWN,

Petitioner,

v.

LOUISIANA,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amici Curiae Current and Former Prosecutors and Department of Justice Officials in Support of Petitioner contains 3,847 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 26, 2022.

B CC Mary B. McCord