

IN THE SUPREME COURT OF THE UNITED STATES

No. 23-323

JOSEPH GAMBOA,
Petitioner,

v.

BOBBY LUMPKIN, DIRECTOR,
TEXAS DEPARTMENT OF CRIMINAL JUSTICE,
CORRECTIONAL INSTITUTIONS DIVISION,
Respondent.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of American Bar Association as Amicus Curiae in Support of Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 4,335 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 Office Word 2016) used to prepare the document.

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

Executed on October 30, 2023.



Derek Reinbold
*Counsel for Amicus
American Bar Association*