

In the Supreme Court of the United States

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TRAVIS J. BROWN, *Petitioner*,

v.

PEOPLE OF THE STATE OF CALIFORNIA, *Respondent*.

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CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 4,937 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.

Respectfully submitted,

ROB BONTA  
Attorney General of California

S/ Alan L. Amann  
ALAN L. AMANN  
Deputy Attorney General  
*Counsel of Record Counsel for  
Respondent*

Dated: October 30, 2023