No. 23-5567
In the

Supreme Court of the United States

Carlos Gilbert Arrellano-Ramirez, Petitioner, v. State of Florida, Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Henry C. Whitaker, counsel of record for Respondent and a member of the Bar of this Court, certify that the Brief in Opposition in this case contains 6,235 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

<u>/s/ Henry C. Whitaker</u> Counsel of Record

October 25, 2023