

IN THE  
**Supreme Court of the United States**

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ATIF AHMAD RAFAY,

*Petitioner,*

v.

ERIC JACKSON,

*Respondent.*

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

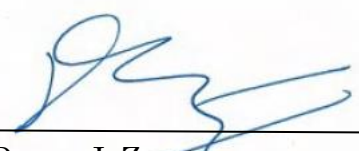
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**CERTIFICATE OF COMPLIANCE**

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I am a member of the Bar of this Court, and as required by Supreme Court Rule 33.1(h), I certify this 22<sup>nd</sup> day of January, 2024, that the Brief of Law Enforcement Training and Interrogation Experts as *Amici Curiae* Supporting Petitioner contains 5,546 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

January 22, 2024



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