## IN THE

## Supreme Court of the United States

CARLOS GUARDADO,

Petitioner,

v.

COMMONWEALTH OF MASSACHUSETTS,

Respondent.

On Petition for a Writ of Certiorari to the Supreme Judicial Court of Massachusetts

## CERTIFICATE OF COMPLIANCE

As required by this Court's Rule 33.1(h), I, David J. Zimmer, a member of the Bar of this Court, certify that the Petition for a Writ of Certiorari to the Supreme Judicial Court of Massachusetts contains 8,992 words, excluding the parts of the document that are exempted by Rule 33.1(d).

February 14, 2024

David J. Zimmer

GOODWIN PROCTER LLP

100 Northern Avenue

Boston, MA 02210

dzimmer@goodwinlaw.com

(617) 570-1000