



CERTIFICATE OF COMPLIANCE

No. 23-934

ARELI ESCOBAR,

Petitioner,

v.

STATE OF TEXAS,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amici Curiae Former State Attorneys General, United States Attorneys, and Prosecutors in Support of Petitioner contains 3,625 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio
County of Hamilton

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

Executed on March 28, 2024.

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: March 28, 2024

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2028