

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

—————  
MICHAEL N. CURRIER,  
*Petitioner,*  
v.

COMMONWEALTH OF VIRGINIA,  
*Respondent.*

—————

**On Writ of Certiorari  
to the Supreme Court of Virginia**

—————  
**BRIEF OF THE NATIONAL ASSOCIATION  
OF CRIMINAL DEFENSE LAWYERS  
AS *AMICUS CURIAE*  
IN SUPPORT OF PETITIONER**

—————

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,326 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.

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Executed on December 7, 2017.

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Christopher R. Dorsey  
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