No. 17-1417

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IN THE

Supreme Court of the United States

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KAREN HOWELL,

Petitioner,

v.

STATE OF TENNESSEE,

Respondent.

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On Petition To The Court Of Criminal Appeals Of Tennessee, Eastern Division

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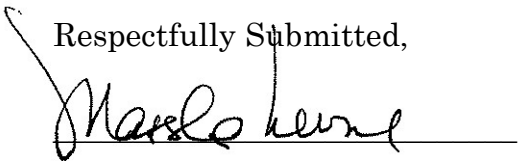
CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Juvenile Law Center, Center on Wrongful Convictions of Youth, and Center for Law, Brain, and Behavior in Support of Petitioner contains 5,778 words, excluding the parts of the Brief of Amicus Curiae that are exempted by Supreme Court Rule 33.1(d).

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

Executed this 24th day of April 2018.

Respectfully Submitted,



Marsha L. Levick
JUVENILE LAW CENTER