

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

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No. 18-485

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EDWARD G. McDONOUGH, PETITIONER,

v.

YOUEL SMITH, INDIVIDUALLY AND AS SPECIAL DISTRICT ATTORNEY FOR THE COUNTY OF  
RENSSELAER, NEW YORK, AKA TREY SMITH.

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the Center on the Administration of Criminal Law at NYU School of Law, the American Civil Liberties Union, the New York Civil Liberties Union, and the Brennan Center for Justice at NYU School of Law as *amici curiae* in support of Petitioner in the above-entitled case contains 5,727 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.

Executed on March 4, 2019.

/s/ Mark W. Mosier  
Mark W. Mosier