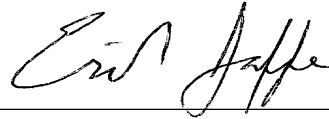


**CERTIFICATE OF COMPLIANCE**

I hereby certify that the accompanying MOTION FOR LEAVE TO FILE BRIEF AND BRIEF OF CRIMINAL LAW PROFESSORS AND THE CATO INSTITUTE AS AMICI CURIAE IN SUPPORT OF GRANTING CERTIORARI in Copeland v. Vance, No. 18-918, complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 2,492 words, based on the word-count function of Microsoft Word (Office 365), including footnotes and excluding material not required to be counted by Rule 33(d).

A handwritten signature in black ink, appearing to read "Erik S. Jaffe", is written above a horizontal line.

Erik S. Jaffe