

IN THE
Supreme Court of the United States

DAVID SHINN, *et al.*,

Petitioners,

v.

DAVID MARTINEZ RAMIREZ AND BARRY LEE JONES,

Respondents.

**On Writ of Certiorari to the
United States Court of Appeals
for the Ninth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* of Habeas Scholars in Support of Respondents contains 3,485 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d), in compliance with the word limit set forth in Supreme Court Rule 33.1(g)(x).

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

Executed on the 20th of September, 2021.

/s/ Boris Bershteyn
Boris Bershteyn