

No. 20-157

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In the  
**Supreme Court of the United States**

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EDWARD A. CANIGLIA,  
*Petitioner,*

v.

ROBERT F. STROM, et al.,  
*Respondents.*

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

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF PACIFIC LEGAL FOUNDATION IN SUPPORT OF PETITIONER contains 7,172 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 January 13, 2021.



DANIEL WOISLAW

*Counsel of Record*

Pacific Legal Foundation  
930 G Street  
Sacramento, California 95814  
Telephone: (916) 419-7111  
Facsimile: (916) 419-7747  
dwoislaw@pacificlegal.org

*Counsel for Petitioners*