

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

ARTHUR GREGORY LANGE,

Petitioner,

v.

STATE OF CALIFORNIA,

Respondent.

CERTIFICATE OF SERVICE

I hereby certify that I am a member in good standing of the Supreme Court Bar, all counsel have consented to electronic service, and that, on this 13th day of August, 2020, copies of the Brief of National Association of Criminal Defense Lawyers and California Attorneys for Criminal Justice as Amici Curiae in Support of Petitioner were sent to:

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Respectfully submitted,



Arn Jacobsen