

**IN THE
SUPREME COURT OF THE UNITED STATES**


Arthur Gregory Lange, Petitioner,

v.

California, Respondent

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Lisa S. Blatt, counsel for *Amici Curiae* American Civil Liberties Union, American Civil Liberties Union of Northern California, the Cato Institute, the R Street Institute, the American Conservative Union Foundation, and Professor Alexandra Natapoff, and a member of the Bar of this Court, certify that the Brief of the foregoing *Amici Curiae* in the above-captioned case contains 7,166 words, excluding parts of the brief that are exempted by Rule 33.1(d).



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