

No. 20-18
IN THE
Supreme Court of the United States

ARTHUR GREGORY LANGE,
Petitioner,

v.

CALIFORNIA,
Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,984 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 December 11, 2020.

/s/ Jessica Ring Amunson
Jessica Ring Amunson