

No. 20-18

---

IN THE  
**Supreme Court of the United States**

---

ARTHUR GREGORY LANGE,

*Petitioner,*

v.

CALIFORNIA,

*Respondent.*

---


**CERTIFICATE OF COMPLIANCE**

---

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief of Court-Appointed Amicus Curiae Amanda K. Rice in Support of the Judgment Below in *Lange v. California*, No. 20-18, complies with the word limitations, as it contains 12,998 words.

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

Date: January 8, 2021



---

Anthony J. Dick