

No. 20-18

In the Supreme Court of the United States

ARTHUR LANGE,

Petitioner,

v.

CALIFORNIA,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF *AMICI CURIAE* STATES OF OHIO, ALABAMA, ARKANSAS, IDAHO, INDIANA, KANSAS, LOUISIANA, MISSISSIPPI, OKLAHOMA, SOUTH CAROLINA, SOUTH DAKOTA, TENNESSEE, TEXAS, AND UTAH IN SUPPORT OF COURT-APPOINTED *AMICUS CURIAE* contains 7,111 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 14, 2021.



BENJAMIN M. FLOWERS
Ohio Solicitor General