

No. 20-18

IN THE
Supreme Court of the United States

ARTHUR GREGORY LANGE,

Petitioner,

v.

STATE OF CALIFORNIA,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of Professor Steven Penney as *Amicus Curiae* in Support of the Judgment Below contains 5,109 words and complies with the word limitation established by Rule 33.1(g)(xiv) of the Rules of this Court.

Dated: January 15, 2021



David Debold