

IN THE SUPREME COURT OF THE UNITED STATES

No. 20-937

ROBERT ANDREWS,

*Petitioner,*

v.

STATE OF NEW JERSEY,

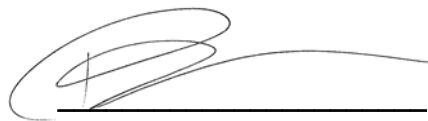
*Respondent.*

---

CERTIFICATE OF COMPLIANCE WITH RULE 33.1(g)

---

I, Ryan G, Baker, counsel for Laurent Sacharoff, hereby certify that, according to the word-count tool in Microsoft Word, the Brief of Laurent Sacharoff, Professor of Law at the University of Arkansas, as *Amicus Curiae* in Support of Petition for Certiorari consists of 4,454 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The Brief therefore complies with Rule 33.1(g) of the *United States Supreme Court*.



---

RYAN G. BAKER

WAYMAKER LLP

777 S. Figueroa St., Suite 2850

Los Angeles, CA 90017

(424) 652-7800

rbaker@waymakerlaw.com