

IN THE SUPREME COURT OF THE UNITED STATES

SHARON LYNN
BROWN,

Petitioner,

v.

POLK COUNTY,
WISCONSIN, *ET AL.*

Respondents.

*On Writ of Certiorari to the United States
Court of Appeals for the Seventh Circuit*

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Ruth Brown, hereby certify I am a member of the bar of this Court, and that according to the word-count tool in Microsoft Word, the Brief of National Association of Criminal Defense Lawyers and Restore the Fourth as *Amici Curiae* in Support of Petitioner consists of 3,472 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The brief therefore complies with Rule 33.1(g).

Dated: February 24, 2021

/s/ Ruth Brown
Ruth Brown
*Counsel of Record for
Amici Curiae*