

IN THE
Supreme Court of the United States

RODNEY REED,
Petitioner,

v.

BRYAN GOERTZ,
Respondent.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Meaghan VerGow, a member of the bar of this Court, certify on this 8th day of July, 2022, that the Brief of Federal Courts Scholars as *Amici Curiae* in Support of Petitioner in the above-captioned case contains 5,452 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

/s/ Meaghan VerGow

Meaghan VerGow
