

No. 21-5592

In the Supreme Court of the United States

JOHN HENRY RAMIREZ, PETITIONER,

v.

BRYAN COLLIER, EXECUTIVE DIRECTOR,
TEXAS DEPARTMENT OF CRIMINAL JUSTICE, ET AL., RESPONDENTS

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 hereby certify that the “Brief of Scholars of the PLRA and Prison Grievance Systems as *Amici Curiae* in Support of Petitioner” filed in the above-captioned matter contains 4,072 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 September 27, 2021.



Jennifer S. Freel
Counsel for *Amici Curiae*