

January 6, 2022

Clerk  
Supreme Court of the United States  
1 First Street, NE  
Washington, D.C. 20002

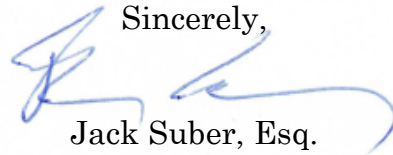
**RE NO. 21-846: JOHN MONTENEGRO CRUZ V. ARIZONA**

Dear Sir or Madam:

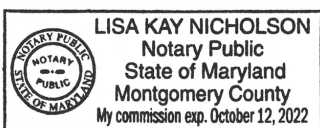
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Habeas Scholars referenced above contains **5,246** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d) but including all words in Appendix B.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Jack Suber, Esq.  
Principal



6RUD□ BEUEHEHIRUHHWW□ DBI□ DDU□

*Lisa K Nicholson*