

No. 22-430

In the
Supreme Court of the United States

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Charles Barton and Nathan Sanders,
Petitioners

v.
The State of Texas
Respondent

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**On Petition For Writ Of Certiorari
To The Court of Criminal Appeals of Texas**

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**CERTIFICATE OF WORD COUNT
FOR
BRIEF OF AMICUS CURIAE
THE TEXAS CRIMINAL DEFENSE LAWYERS ASSOCIATION
IN SUPPORT OF PETITIONER**

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J. Edward Niehaus (#291968)
Counsel of Record
Bodkin Niehaus Dorris & Jolley PLLC
6021 Morriss Rd., Suite 111
Flower Mound, TX 75028
(972) 704-1368
Jason@BNDJlegal.com
Counsel for Amicus Curiae

To the Honorable Justices of the United States Supreme Court,

Counsel for Amicus Curiae, the Texas Criminal Defense Lawyers Association, by affixing signature hereto, certifies that the word count of the amicus curiae brief, omitting no portion of the brief, is 4,357 words, a number within the word limit for a brief at the petition stage.

Respectfully submitted,

/s/ J. Edward Niehaus

J. Edward Niehaus (#291968)

Counsel of Record

Bodkin Niehaus Dorris & Jolley PLLC

6021 Morriss Rd., Suite 111

Flower Mound, TX 75028

(972) 704-1368

Jason@BNDJlegal.com

Counsel for Amicus Curiae