

IN THE
Supreme Court of the United States

DAVID BROWN,
Petitioner,

v.

LOUISIANA,
Respondent.

**On Petition for a Writ of Certiorari
to the Supreme Court of Louisiana**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Jeffrey L. Fisher, a member of the bar of this Court, certify on this 25th day of July, 2022, that the Petition for a Writ of Certiorari in the above-captioned case contains 8,260 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

/s/ Jeffrey L. Fisher

Jeffrey L. Fisher
