

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

CAPITAL CASE

No. 22-77

DAVID BROWN,

*Petitioner,*

v.

LOUISIANA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Jeffrey T. Green, certify that the Brief of Amici Curiae The National Association of Criminal Defense Lawyers (NACDL) in Support of Petitioner in the foregoing case contains 4,726 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 August 26, 2022.

*/s/ Jeffrey T. Green*

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