

No. 23-1332

In the
Supreme Court of the United States

JARIUS BROWN,

Petitioner,

v.

JAVARREA POUNCY, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Anya Bidwell, counsel of record for amicus and a member of the Bar of this Court, certify that the Brief of the Institute For Justice as Amicus Curiae in Support of Petitioners in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that the petition complies with the word limit of Supreme Court Rule 33.1(g). It contains 5,987 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

July 22, 2024

s/ Anya Bidwell

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