

IN THE
Supreme Court of the United States

JARIUS BROWN,

Petitioner,

vs.

JAVARREA POUNCY, ET AL.,

Respondent.

CERTIFICATE OF WORD COUNT

I certify that the *amicus curiae* brief of the Orleans Public Defenders complies with the word-count limits of Supreme Court Rule 33.1. The *amicus curiae* brief (including footnotes but not including the table of contents, the table of cited authorities and the list of counsel at the conclusion) includes 4,132 words as calculated by the word-counting feature of Microsoft Word.

I declare under penalty of perjury under the laws of the United States of America (28 U.S.C. § 1746) that the foregoing is true and correct.

July 22, 2024

/s/ Cynthia M. Ohlenforst