

**In the
Supreme Court of the United States**

MISSOURI DEPARTMENT OF CORRECTIONS,
Petitioner,

v.

JEAN FINNEY,
Respondent.

*On Petition for Writ of Certiorari to the
Missouri Court of Appeals, Western District*

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Andrew N. Ferguson, a member of the bar of this Court, certify that the accompanying Brief of the Commonwealth of Virginia and 12 Other States as *Amici Curiae* in Support of Petitioner contains 4,701 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on October 5, 2023.

/s/ Andrew N. Ferguson

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