

No. 23-5171  
In the  
**Supreme Court of the United States**

---

NATOYA CUNNINGHAM,  
*Petitioner,*

v.

STATE OF FLORIDA,  
*Respondent.*

---

**CERTIFICATE OF COMPLIANCE**

---

As required by Supreme Court Rule 33.1(h), I, Henry C. Whitaker, counsel of record for Respondent and a member of the Bar of this Court, certify that the Brief in Opposition in this case contains 4,943 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Henry C. Whitaker  
Counsel of Record

October 17, 2023