

IN THE  
**Supreme Court of the United States**

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HOLLY ANN ELKINS,  
*Petitioner,*

v.

THE UNITED STATES,  
*Respondent.*

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**On Petition for a Writ of Certiorari to the  
United States Court of Appeals  
for the Fifth Circuit**

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**AMICUS CURIAE BRIEF OF  
THE TEXAS CRIMINAL DEFENSE  
LAWYERS ASSOCIATION  
IN SUPPORT OF THE PETITIONER**

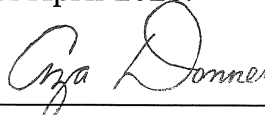
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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains **4,841** 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.

Sworn to and subscribed before me this 6th day of April 2026.



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AZA SALINDER DONNER  
NOTARY PUBLIC  
District of Columbia

My commission expires April 30, 2029.

