

No. 25-1312

In the Supreme Court of the United States

DEXTER PAYNE, DIRECTOR,
ARKANSAS DIVISION OF CORRECTION,
Petitioner,

v.

HARL A. GARRETT,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF *AMICI CURIAE* STATE OF OHIO AND 18 OTHER STATES IN SUPPORT OF PETITIONER contains 5,116 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.

Executed on June 26, 2026.

/s/ Mathura J. Sridharan
MATHURA J. SRIDHARAN
Ohio Solicitor General