No. 25-246

In the

# Supreme Court of the United States

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KENNETH J. JOUPPI,

*Petitioner*,

v.

STATE OF ALASKA,

*Respondent*.

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## CERTIFICATE OF COMPLIANCE

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As required by Supreme Court Rule 33.1(h), I, David M.S. Dewhirst, counsel of record for *Amici* and a member of the Bar of this Court, certify that the *Amicus Curiae* Brief in this case contains 4,851 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

*/s/ David M.S. Dewhirst*
Counsel of Record

October 13, 2026