IN THE

Supreme Court of the United States

JANICE HUGHES BARNES, INDIVIDUALLY AND AS REPRESENTATIVE OF THE ESTATE OF ASHTIAN BARNES, DECEASED,

Petitioner,

v. Roberto Felix Jr.; County of Harris, Texas,

Respondents.

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Constitutional Accountability Center as *Amicus Curiae* in Support of Petitioner contains 7,225 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 November 20, 2024.

/s/ Brian R. Frazelle
Brian R. Frazelle
Counsel for Amicus Curiae