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February 27, 2025

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE 23-934: ARELI ESCOBAR V. STATE OF TEXAS

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Petitioner's Supplemental Brief referenced above contains **2,998** 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.

Sincerely, Jack Suber, Esq. Principal



LISA KAY NICHOLSON Notary Public State of Maryland Montgomery County commission exp. October 12, 2026

Sworn and subscribed before me this 27th day of February 2025.

Nicholson