In the Supreme Court of the United States

LAMAR, ARCHER & COFRIN, LLP,

Petitioner,

V.

R. SCOTT APPLING,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Paul W. Hughes, counsel for petitioner and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Brief for Respondent contains 14,882 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Sincerely,

Paul W. Hughes