No. 17-1095

In the

Supreme Court of the United States

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Michael David Melton, *Petitioner*,

v.

Kelly D. Phillips,

Respondent.

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CERTIFICATE OF COMPLIANCE WITH RULE 33.1(h)

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Pursuant to Supreme Court Rule 33.1(h), the undersigned certifies that this brief complies with the type-volume limitations of Rule 33.1(g).

- 1. Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 2,681 words. (The undersigned is relying on the word-count utility in Microsoft Word 2010, the word-processing system used to prepare the brief, consistent with Rule 33.1(d)).
- 2. The brief was produced with Microsoft Word 2010 software in New Century Schoolbook Limited Standard 12-point typeface.

Jonathan S. Massey March 19, 2018