CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that Petitioner's *Reply In Support Of Petition for a Writ of Certiorari* contains <u>2961</u> 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 September 11th, 2018.

W. Lee Gresham

Heninger Garrison Davis, LLC