## In the Supreme Court of the United States

JEFFERY LEE,
Petitioner,
v.
STATE OF ALABAMA,
Respondent.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF IN OPPOSITION contains 3829 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on January 29, 2018.

Andrew L. Brasher Solicitor General

State of Alabama

 $Counsel\ for\ Respondent$