No. 18-355

IN THE Supreme Court of the United States

PRISON LEGAL NEWS,

Petitioner,

V.

SECRETARY, FLORIDA DEPARTMENT OF CORRECTIONS,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that, pursuant to Rule 33.1(h) of the Rules of this Court, the Brief of Law Professors as *Amici Curiae* in Support of Petitioner complies with the type-volume limitations of Rule 33.1(g). Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 5,993 words. (The undersigned is relying on the word-count utility in Microsoft Word 2016, the word-processing system used to prepare the brief, consistent with Rule 33.1(d).)

Charles H. Davis October 19, 2018