

IN THE  
SUPREME COURT OF THE UNITED STATES  
TIA SKINNER  
*Petitioner,*

V.

STATE OF MICHIGAN

*Respondent.*

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**CERTIFICATE OF WORD COUNT**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,370 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 November 19, 2018

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