## IN THE

## Supreme Court of the United States

BRANDON WASHINGTON,

Petitioner,

 $\mathbf{v}$ 

STATE OF ALABAMA,

Respondent.

On Petition for a Writ of Certiorari to the Alabama Court of Criminal Appeals

## REPLY BRIEF FOR THE PETITIONER

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,958 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 February 1, 2019.

Christopher R. Dorsey

Wilson-Epes Printing Co., Inc.