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AMERICA . ASIA PACIFIC . EUROPE

## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 18-8739

Armando Lopez,

Petitioner

v.

## Massachusetts,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Jeffrey T. Green, certify that the Reply Brief of Petitioner in the foregoing case contains 2,758 words, excluding the parts of the document that are excluded by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 25, 2019.

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