

No. _____

IN THE
Supreme Court of the United States

BRENDA JEFFREY,

Petitioner,

v.

STATE OF WEST VIRGINIA,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Petition for Writ of Certiorari in *Jeffrey v. West Virginia*, No. _____, complies with the word limitations, as it contains 8,531 words.

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

Date: January 7, 2019



Adria R. Villar