

No. 18-913

IN THE

**Supreme Court of the United States**

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JOSHUA BRENNAN,  
*Petitioner,*

v.

JAMES DAWSON, ET AL.,  
*Respondents.*

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**WORD COUNT CERTIFICATION**

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As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 2,985 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on October 1, 2019.

  
TILLMAN J. BRECKENRIDGE\*  
PIERCE BAINBRIDGE  
BECK PRICE & HECHT LLP  
601 Pennsylvania Ave., NW  
Suite 700S  
Washington, DC 20004  
Telephone: 202-759-6925  
tjb@piercebainbridge.com

Counsel for Petitioner