

Certification of Word Count

No. 18-99

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IN THE  
**Supreme Court of the United States**

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JOHNNY BARNES, PETITIONER

v.

JOSEPH GERHART ET AL, RESPONDENTS

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*ON PETITION FOR A WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE FIFTH CIRCUIT*

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**REPLY BRIEF**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2537 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 11/21/2018

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