

CERTIFICATE OF COMPLIANCE

This reply brief complies with the type-volume limitations of Rule 33.1(g) of the Rules of Court of the Supreme Court of the United States because it contains 1,878 words, excluding the parts of the brief exempted by Rule 33.1(d) of this Court.

/s/ Danielle Banks

Danielle Banks
Counsel for Petitioner
Bishop Kenneth Shelton

Dated: September 23, 2020