## IN THE SUPREME COURT OF THE UNITED STATES

PENNSYLVANIA, Petitioner v.

JOSEPH J. DAVIS, Respondent

## CERTIFICATE OF COMPLIANCE WITH WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari contains 5,987 words, excluding the parts of the brief that were exempted by Supreme Court Rule 33.1(d).

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

Executed on April 20, 2020.

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