

No. 19-1254

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IN THE SUPREME COURT OF THE UNITED STATES

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COMMONWEALTH OF 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 Reply Brief for Petitioner contains 1,845 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 September 20, 2020.

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