

IN THE SUPREME COURT OF THE UNITED STATES

CHARLES HAMNER,

*Petitioner,*

v.

DANNY BURLS, *ET AL.*

*Respondents.*

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*On Writ of Certiorari to the United States  
Court of Appeals for the Eighth Circuit*

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I, Danielle C. Jefferis, hereby certify I am a member of the bar of this Court, and that according to the word-count tool in Microsoft Word, the Brief of Former Corrections Directors as *Amici Curiae* in Support of Petitioner consists of 3,608 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The brief therefore complies with Rule 33.1(g).

Dated: May 14, 2020

/s/ Danielle C. Jefferis  
Danielle C. Jefferis  
*Counsel of Record for*  
Amici Curiae