No. 19-230

## In The Supreme Court of the United States

DOUGLAS PRADE,

Petitioner,

v.

STATE OF OHIO,

Respondent.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that Petitioner's Reply in Support of Certiorari in *Prade v. Ohio*, No. 19-230, complies with the word limitations, as it contains 2,960 words.

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

Date: October 2, 2019

David Booth Alden