

No. 19-5171
(CAPITAL CASE)

IN THE
SUPREME COURT OF
THE UNITED STATES OF AMERICA

VICTOR HUGO SANDAÑO,
Petitioner

v.

LORI DAVIS, DIRECTOR,
Texas Department of Criminal Justice (Institutional Division),
Respondent

AMENDED WORD COUNT CERTIFICATE

As required by Supreme Court Rule 33.1(h), I certify that the above and forgoing Reply to the Petition for Writ of Certiorari to the Court of Appeals for the Fifth Circuit contains 2,439 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).¹

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

Executed on October 28, 2019.

/s/ Thomas Scott Smith

By: _____

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October 28, 2019

¹ There was a Word Count Certificate at the end of the Reply Brief, but the number of words was erroneously omitted.