IN THE Supreme Court of the United States

CARLOS MANUEL AYESTAS,

Petitioner,

v.

LORIE DAVIS, DIRECTOR, TEXAS DEPARTMENT OF CRIMINAL JUSTICE (INSTITUTIONAL DIVISION),

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Fifth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Deanna M. Rice, a member of the bar of this Court, certify on this 28th day of January, 2020, that the Reply Brief for Petitioner in the above-captioned case contains 2,992 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

Deanna M. Rice