

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply Brief, which was prepared using Century Schoolbook 12-point typeface, contains 3,119 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

DATED this 22nd day of June 2020.

Respectfully submitted,



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