## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 19-

## Willie B. Smith, III,

Petitioner,

v.

## Commissioner, Alabama Department of Corrections,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Steven J. Horowitz, certify that the Petition for a Writ of Certiorari in the foregoing case contains 8,895 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on February 19, 2020.

/s/ Steven J. Horowitz STEVEN J. HOROWITZ SIDLEY AUSTIN LLP One South Dearborn Street Chicago, IL 60603 (312) 853-7000