

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 19-7745

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 Reply Brief in Support of Petition for a Writ of Certiorari in the foregoing case contains 2,791 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 May 26, 2020.

/s/ Steven J. Horowitz
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