

**\*\*\* CAPITAL CASE \*\*\***

No. 19-8039

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IN THE  
SUPREME COURT OF THE UNITED STATES

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JEFFREY CLARK, *Petitioner*,  
*v.*  
STATE OF LOUISIANA, *Respondent*.

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1 (h), I certify that the Reply contains two thousand six hundred and thirty-one (2,631) words, excluding the parts 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 August 17, 2020.

Respectfully Submitted,



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G. Ben Cohen\*