

*** CAPITAL CASE ***

No. 19-8039

IN THE
SUPREME COURT OF THE UNITED STATES

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

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,



G. Ben Cohen*