

NO. 20-1171

IN THE SUPREME COURT OF THE UNITED STATES

MICHAEL MADISON, Petitioner,

v.

STATE OF OHIO, Respondent.

CERTIFICATE OF WORD COUNT COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Timothy F. Sweeney, counsel for Petitioner and a member of the Bar of this Court, hereby certify that PETITIONER'S REPLY BRIEF in the foregoing case contains 2,563 words, excluding the parts of the document that are excluded by Supreme Court Rule 33.1(d).

/s/ Timothy F. Sweeney

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