

**NO. 20-1171**

***IN THE SUPREME COURT OF THE UNITED STATES***

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**MICHAEL MADISON, Petitioner,**

v.

**STATE OF OHIO, Respondent.**

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**CERTIFICATE OF WORD COUNT COMPLIANCE**

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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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Timothy F. Sweeney (OH 0040027)\*  
LAW OFFICE OF TIMOTHY F. SWEENEY  
The 820 Building, Suite 430  
820 West Superior Ave.  
Cleveland, Ohio 44113-1800  
Phone: (216) 241-5003  
Email: [tim@timsweeneylaw.com](mailto:tim@timsweeneylaw.com)  
\*COUNSEL OF RECORD

Counsel for Petitioner Michael Madison