
**In The
Supreme Court of the United States**

ANNA VALENTINE, Warden

Petitioner

v.

JOHNNY PHILLIPS

Respondent

On Petition for Writ of Certiorari to the United
States Court Of Appeals for the Sixth Circuit
Case No. 18-6184

CERTIFICATE OF COMPLIANCE

I, Courtney J. Hightower, Assistant Attorney General of the Commonwealth of Kentucky as Counsel for Petitioner, certify that the foregoing Supplemental Brief was typed using Century Schoolbook 12-point font, as set forth in Rule 33(1)(b) of the Rules of the Supreme Court of the United States, contains 514 words, and that this Supplemental Brief conforms to all the specifications set forth in Rule 33 of the Rules of the Supreme Court of the United States.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 26, 2021.

/s/Courtney J. Hightower
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