## In The Supreme Court of the United States

 $\begin{array}{c} \text{Davdrin Goffin,} \\ \textbf{\textit{Petitioner,}} \end{array}$ 

v.

ROBBIE K. ASHCRAFT, INDIVIDUALLY AND OFFICIAL CAPACITY AS POLICE OFFICER, WARREN, AR, Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Eighth Circuit

## CERTIFICATE OF WORD COUNT

I HEREBY CERTIFY, pursuant to Supreme Court Rule 33.1(h), that the accompanying Reply in Support of the Petition for a Writ of Certiorari, which was prepared using Century Schoolbook 12-point typeface contains 1,968 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

**Executed** this 25th day of August, 2021.

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