CERTIFICATE OF WORD COUNT

Case No. 20-5760

Case Name:

Daniel Frederickson v. State of California

Document Title:

Reply to Brief in Opposition

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying REPLY TO BRIEF IN OPPOSITION filed by petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 1,413 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.

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

DATED this 26th day of October 2020.

DOUGLAS G. WARD

Counsel of Record

350 Bay Street, P.M.B. #199 San Francisco, California (415) 494-9252 wardhere@icloud.com

Counsel for Petitioner