

No. 20-588

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

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LYNEAL WAINWRIGHT, WARDEN,

*Petitioner,*

v.

JASON S. SEXTON,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the REPLY IN SUPPORT OF PETITION FOR WRIT OF CERTIORARI contains 2,129 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on December 7, 2020.

/s/ Benjamin M. Flowers

BENJAMIN M. FLOWERS

Ohio Solicitor General

*Counsel for Petitioner*

*Lyneal Wainwright*