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RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 20-

Kevin Francis,

Petitioner

v.

Massachusetts,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Jeffrey T. Green, certify that the Petition for a Writ of Certiorari in the foregoing case contains 4,817 words, excluding the parts of the document that are excluded by Supreme Court Rule 33.1(d).

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

Executed on December 23, 2020.

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