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## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 20-6731

Kevin Francis,

*Petitioner*

v.

Massachusetts,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Jeffrey T. Green, certify that the Reply Brief in the foregoing case contains 2,703 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 May 25, 2021.

/s/ Jeffrey T. Green  
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