

No. 20-7339

KEVIN ANTONIO WATSON, PETITIONER  
V.  
COMMONWEALTH OF VIRGINIA.

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF IN OPPOSITION in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century 12 point for the text and 10 point for the footnotes, and this brief contains 2,372 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

**Toby J.  
Heytens**

Digitally signed by Toby J.  
Heytens  
Date: 2021.06.10 11:17:35  
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