

SIDLEY AUSTIN LLP 1501 K STREET, N.W. WASHINGTON, D.C. 20005 +1 202 736 8000 +1 202 736 8711 FAX

> +1 202 736 8000 TLOSSEAT ON@ SID LEY.COM

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## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

CAPITAL CASE

No. 20-

## Alan Eugene Miller,

Petitioner

v.

## Commissioner, Alabama Department of Corrections,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Tobias S. Loss-Eaton, certify that the Petition for a Writ of Certiorari in the foregoing case contains 7,439 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 March 25, 2021.

/s/ Tobias S. Loss-Eaton

Tobias S. Loss-Eaton Sidley Austin llp 1501 K Street, N.W. Washington, D.C. 20005 (202) 736-8000 tlosseaton@sidley.com