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RULE 33.1(h) CERTIFICATE OF COMPLIANCE

CAPITAL CASE

No. 20-7592

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 Petitioner's Reply Brief in the foregoing case contains 2,934 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 June 16, 2021.

/s/ Tobias S. Loss-Eaton

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