## IN THE SUPREME COURT OF THE UNITED STATES October Term, 2020

DAVID SCOTT FRANKS, Petitioner

-v-

BENJAMIN FORD, Warden, Georgia Diagnostic Prison, Respondent.

CERTIFICATE OF COMPLIANCE WITH RULE 33.2

I, Monet A. Brewerton-Palmer, counsel for Mr. David Scott Franks, hereby certify that Mr. Franks's Reply to Respondent's Response to his Petition for Writ of Certiorari consists of 15 pages, including footnotes but excluding the sections enumerated by Rule 33.1(d). The Petition therefore complies with Rule 33.2.

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