

No. 20-826

In the Supreme Court of the United States

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MIKE BROWN, ACTING-WARDEN, PETITIONER

v.

ERVINE DAVENPORT

**ON PETITION FOR A WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT**

CERTIFICATE OF COMPLIANCE

Attorney for Petitioner Warden Mike Brown, hereby certifies that the foregoing Reply Brief complies with the type-volume limitation of Supreme Court Rule 33.1(g)(iii), in that the word-processing system used to prepare the brief indicates that the brief contains 3,000 words.

Respectfully submitted,

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