

No. 20-911

IN THE
Supreme Court of the United States

MICHAEL JACKSON,
Petitioner,

v.

DON HUDSON, WARDEN,
Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that, pursuant to Rule 33.1(h) of the Rules of this Court, the Reply Brief of Petitioner complies with the type-volume limitations of Rule 33.1(g). Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 2,990 words. (The undersigned is relying on the word-count utility in Microsoft Word 2016, the word-processing system used to prepare the brief, consistent with Rule 33.1(d).)



Kevin K. Russell
May 24, 2021