IN THE

Supreme Court of the United States

DEXTER PAYNE, DIRECTOR, ARKANSAS DIVISION OF CORRECTION,

Petitioner,

v.

ALVIN BERNAL JACKSON,

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Eighth Circuit

REPLY BRIEF FOR PETITIONER

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the brief contains 1,734 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 6, 2022.

Colin Casey Hogan

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