

No. 21-579

**KENNETH EUGENE SMITH**

Petitioner,

v.

**JEFFERSON S. DUNN, et al.,**

Respondent.

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that Respondent's Brief in Opposition to Certiorari contains 5,872 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 the 30th day of December 2021.

*s/Richard D. Anderson\**

Assistant Attorney General

\*Counsel of Record

Office of the Attorney General  
State of Alabama  
501 Washington Avenue  
Montgomery, AL 36130  
(334) 242-7300  
[richard.anderson@alabamaag.gov](mailto:richard.anderson@alabamaag.gov)