

**CERTIFICATE OF COMPLIANCE**

I hereby certify that the accompanying Petition for Writ of Certiorari in Smith v. State of Florida, No. \_\_\_\_\_ complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 8474 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).

  
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