## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 21-6593

Murray Hooper,

Petitioner,

v.

## David Shinn,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Jean-Claude André, hereby certify that the Reply Brief for Petitioner in the foregoing case contains 2,979 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 March 15, 2022.

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