

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 21-6822  
CAPITAL CASE

JAMES E. BARBER,

*Petitioner,*

v.

COMMISSIONER, ALABAMA DEPARTMENT OF CORRECTIONS,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Joshua J. Fougere, certify that the Reply Brief in the foregoing case contains 1,816 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 February 23, 2022.

/s/ Joshua J. Fougere

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