No. 22-231

IN THE SUPREME COURT OF THE UNITED STATES

ARTUR DAVIS,

Petitioner,

v.

LEGAL SERVICES ALABAMA, INC., ET AL.,

Respondents.

WORD-COUNT CERTIFICATE

As required by this Court's Rule 33.1(h), I certify that the accompanying Reply Brief for Petitioner contains 1,746 words, as calculated by the word-processing software Microsoft Word 2019, excluding the parts of the document that are exempted by Rule 33.1(d).

Respectfully submitted,

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