RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 22-6629

KEITH EDMUND GAVIN,

Petitioner,

v.

COMMISSIONER, ALABAMA DEPARTMENT OF CORRECTIONS,

Respondent.

As required by Supreme Court Rule 33, I, Steven J. Horowitz, certify that the Reply Brief for Petitioner in the foregoing case contains 15 pages, 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 April 12, 2023.

/s/ Steven J. Horowitz STEVEN J. HOROWITZ SIDLEY AUSTIN LLP One South Dearborn Chicago, IL 60603 (312) 853-7000