

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

CAPITAL CASE

No. 22-6655

THEODORE WASHINGTON,

Petitioner,

v.

RYAN THORNELL, DIRECTOR,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Jeffrey T. Green, certify that the reply brief in the foregoing case contains 2,864 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 1, 2023.

/s/ Jeffrey T. Green

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