IN THE SUPREME COURT OF THE UNITED STATES

JAMES KING,

Petitioner,

v.

DOUGLAS BROWNBACK; TODD ALLEN,

Respondents.

CERTIFICATE OF COMPLIANCE

In compliance with this Court's Rule 33.1(h), I hereby certify that the Reply in Support of Certiorari contains 2,669 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d) and that it complies with the typeface requirement of Supreme Court rule 33.1(b), being prepared in Century Schoolbook 12-point font for the text and 10-point font for the footnotes. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of August, 2023.

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