No. 23-167

## In the Supreme Court of the United States

◆ COMMISSIONER, ALABAMA DEPARTMENT OF CORRECTIONS, Petitioner, V. JOSEPH CLIFTON SMITH, Respondent. ON PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

## **CERTIFICATE OF COMPLIANCE**

- .

As required by Supreme Court Rule 33.1(h), I certify that the REPLY BRIEF FOR PETITIONER contains 2,966 words, excluding the parts of the document that are exempted from the word limits by Supreme Court Rule 33.1(d).

Executed on October 4, 2023.

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