

No. \_\_\_\_\_

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**In the Supreme Court of the United States**

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HEIDI E. WASHINGTON,  
DIRECTOR OF THE MICHIGAN DEPARTMENT OF CORRECTIONS, PETITIONER

v.

JAMES HARRISON FOX; SCOTT DAVID PERREAULT

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**ON PETITION FOR A WRIT OF  
CERTIORARI TO THE  
UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT**

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**CERTIFICATE OF COMPLIANCE**

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Attorney for Petitioner Heidi E. Washington hereby certifies that the foregoing Petition for Writ of Certiorari complies with the type-volume limitation of Supreme Court Rule 33.1(g)(i), in that the word-processing system used to prepare the brief indicates that the brief contains 8,599 words.

Respectfully submitted,

*Ann M. Sherman*

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