

**No. 23-514**

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

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KIM JACKSON,

*Cross-Petitioner,*

v.

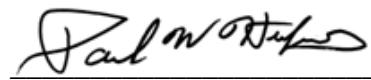
CHRIS DUTRA, JASON EDMONSON & ERIC DEJESUS,

*Cross-Respondents.*

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**CERTIFICATE OF COMPLIANCE**

I, Paul W. Hughes, counsel for cross-petitioner Kim Jackson and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this reply in support of conditional cross-petition for a writ of certiorari contains 1,655 words, excluding the parts of the brief that are exempted by Rule 33.1(d).



Paul W. Hughes