

CERTIFICATE OF COMPLIANCE

No. 23-651

John Lowery, Petitioner

v.

Mike Parris, Respondent

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply in Support of Certiorari, which was prepared using Century Schoolbook 12-point typeface, contains 1,121 words, excluding the parts of the document that are exempted by Rule 33.1(d).

This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24th day of January 2024.

Respectfully submitted,

Daniel S. Harawa

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