In the Supreme Court of the United States

ANNETTE CHAMBERS-SMITH, Director, Ohio Department of Rehabilitation and Correction,

Petitioner,

v.

KAYLA JEAN AYERS,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Paul W. Hughes, counsel for respondent and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this brief in opposition contains 8,797 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Paul W. Hughes