## Supreme Court of the United States

COMMISSIONER,
ALABAMA DEPARTMENT OF CORRECTIONS,
Petitioner,

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 2,996 words, excluding the parts of the document that are exempted from the word limits by Supreme Court Rule 33.1(d).

Executed on May 6, 2025.

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