## Supreme Court of the United States

JOHN Q. HAMM, COMMISSIONER OF THE ALABAMA DEPARTMENT OF CORRECTIONS,

Petitioner,

v.

JOSEPH CLIFTON SMITH,

Respondent.

ON 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 BRIEF FOR PETITIONER contains 12,186 words, excluding the parts of the document that are exempted from the word limits by Supreme Court Rule 33.1(d).

Executed on August 4, 2025.

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