No. _____

In the Supreme Court of the United States

Karen Howell,

Petitioner,

v.

State of Tennessee,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Petition for a Writ of Certiorari filed on behalf of Petitioner Karen Howell contains 8,478 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on the 10th day of April 2018.

William H. Milliken
Counsel of Record
Sterne, Kessler, Goldstein
& Fox, P.L.L.C.
1100 New York Avenue, N.W.
Washington, D.C. 20005
(202) 371-2600
wmilliken@sternekessler.com