

No. 18-556

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IN THE  
**Supreme Court of the United States**

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STATE OF KANSAS,

*Petitioner,*

v.

CHARLES GLOVER,

*Respondent.*

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CERTIFICATE OF COMPLIANCE

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I hereby certify that I am a member in good standing of the bar of this Court and that, pursuant to Rule 33.1(h) of the Rules of this Court, the Brief in Opposition complies with the type-volume limitations of Rule 33.1(g) (2017). Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 14,609 words. (The undersigned is relying on the word-count utility in Microsoft Word 2016, the word-processing system used to prepare the brief, consistent with Rule 33.1(d).)



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Sarah E. Harrington

August 30, 2019