CAPITAL CASE No. 18-6135

IN THE

Supreme Court of the United States

JAMES K. KAHLER,

Petitioner,

v.

STATE OF KANSAS,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Brief of Philosophy Professors as Amici Curiae in the above-styled case contains 3512 words, excluding parts of the document that are exempted by Rule 33.1(d).

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

Executed on the 30th day of May, 2019.

Eugene R. Fidell

Feldesman Tucker Leifer Fidell LLP

1129 20th St., N.W., 4th Floor

Eugun Fidel

Washington, DC 20036

(202) 256-8675