

SIDLEY

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 18-6135

James Kraig Kahler,

Petitioner,

v.

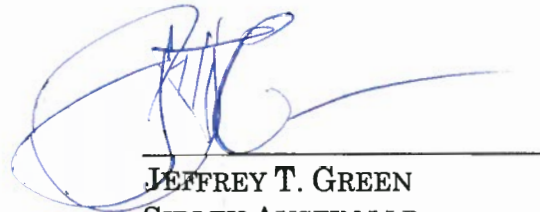
Kansas,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Jeffrey T. Green, certify that the Reply Brief of Petitioner in the foregoing case contains 2,997 words, excluding the 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 December 12, 2018.



JEFFREY T. GREEN
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8291