

CERTIFICATE OF WORD COUNT

I hereby certify, in accordance with Supreme Court Rules that the State of Texas's Opposition to Petition for a Writ of Certiorari in case number 18-9674, styled *Andrus v. Texas*, is within the requisite word and page limits set by the Court for such documents in that the document in page length is 22 pages counting those items required to be under the 40 page limit (and 26 pages in its entirety).¹

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¹The word count of the document, counting those items required to be included in the limits set by the Court is 5,608 words, and the document contains 6,078 words in its entirety which is also within any applicable limits set by the Court.