

IN THE SUPREME COURT OF THE UNITED STATES

CERTIFICATE OF WORD COUNT

**Jeffrey W. Smiles,
Petitioner**

v.

**Berks County, et al.,
Respondent**

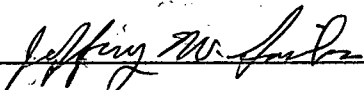
Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply Brief In Support Of Petition For Writ Of Certiorari was prepared using Times New Roman 12-point typeface and contains approximately 2387 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word or equivalent) used to prepare the document.

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

Respectfully Submitted

Date: July 25, 2020

By:



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JUL 29 2020

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SUPREME COURT, U.S.**