



**CERTIFICATE OF COMPLIANCE**

No. 20-1056

JUSTIN MICHAEL WOLFE,

*Petitioner,*

v.

COMMONWEALTH OF VIRGINIA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief contains 2,966 words, excluding the parts of the Petition 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 May 28, 2021.

Amy Triplett Morgan  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: May 28, 2021

John D. Gallagher  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023