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**In The  
Supreme Court of the United States**

ANNA VALENTINE, Warden

*Petitioner*

v.

JOHNNY PHILLIPS

*Respondent*

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On Petition for Writ of Certiorari to the United  
States Court Of Appeals for the Sixth Circuit  
Case No. 18-6184

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**CERTIFICATE OF COMPLIANCE**

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I, Courtney J. Hightower, Assistant Attorney General of the Commonwealth of Kentucky as Counsel for Petitioner, certify that the foregoing Petition for Writ of Certiorari was typed using Century Schoolbook 12-point font, as set forth in Rule 33(1)(b) of the Rules of the Supreme Court of the United States, contains 3,141 words and that this petition conforms to all the specifications set forth in Rule 33 of the Rules of the Supreme Court of the United States.

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

Executed on March 5, 2021.

/s/Courtney J. Hightower  
Courtney J. Hightower  
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