No. 20-5362

In the Supreme Court of the United States

DAVID WAYNE ALLEN,

Petitioner,

v.

TIM SHOOP, WARDEN,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF IN OP-POSITION contains 3,373 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 August 20, 2020.

/s/ Benjamin M. Flowers
BENJAMIN M. FLOWERS
Ohio Solicitor General
Counsel for Respondent
Tim Shoop