

In the
Supreme Court of the United States

JEFFERSON DUNN,

COMMISSIONER, ALABAMA DEPARTMENT OF CORRECTIONS,

Applicant,

v.

WILLIE B. SMITH III,

Respondent.

*To the Honorable Clarence Thomas, Associate Justice of the United States
Supreme Court and Circuit Justice for the Eleventh Circuit*

CERTIFICATE OF COMPLIANCE

I, Douglas R. McKusick, an attorney representing The Rutherford Institute as *amicus curiae*, do hereby certify that the enclosed Motion for Leave to File Brief as *Amicus Curiae* and Brief of The Rutherford Institute as in Support of as *Amicus Curiae* in Support of Respondent by the word count feature of MS Word, and including footnotes but excluding those parts enumerated for exclusion under the Rules of the Supreme Court of the United States, contains 1,488 words.

February 11, 2021

Respectfully submitted,

/s/ Douglas R. McKusick

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