

No. 21-467

IN THE
Supreme Court of the United States

CLIFTON MERRILL PARISH,

Petitioner,

v.

THE STATE OF OKLAHOMA ET AL.,

Respondents.

On Petition for a Writ of Certiorari to the
Oklahoma Court of Criminal Appeals

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 8th day of December 2021, that the Reply Brief for Petitioner in the above-captioned case contains 2,987 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Michael R. Dreeben
Michael R. Dreeben