

No. 23-5038

IN THE SUPREME COURT OF THE UNITED STATES

KURT MICHAELS,

Petitioner,

v.

RON DAVIS, Acting Warden of San Quentin State Prison;
ATTORNEY GENERAL FOR THE STATE OF CALIFORNIA,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 9 pages, excluding the parts 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 October 16, 2023.

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