

In the Supreme Court of the United States

ROBIN ROOT,

Petitioner,

v.

JEREMY HOWARD, WARDEN,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Paul W. Hughes, counsel for petitioner Robin Root and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this reply brief contains 2,999 words, excluding the parts of the brief that are exempted by Rule 33.1(d).



Paul W. Hughes