

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 25-6885

JEFFREY DALE BUSBY,

Petitioner,

v.

STATE OF MISSISSIPPI,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Tobias S. Loss-Eaton, certify that the Reply Brief in the foregoing case contains 295 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 June 2, 2026.

/s/ Tobias S. Loss-Eaton
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