

**CERTIFICATE OF COMPLIANCE**

**No. 25-726**

ALAN LANE HICKS,

*Petitioner,*

v.

JONATHAN FRAME,

*Respondent.*

As required under Rule 33.1(h), I am a member of the Bar of this Court and certify that the Reply Brief for Petitioner in the above-captioned case complies with the typeface requirement of Rule 33.1(b) because it was prepared in Century Schoolbook 12-point font for the body text, and contains 2,614 words, excluding the portions that are exempted by Rule 33.1(d).

Executed on March 25, 2026

/s/ Steven J. Alagna

STEVEN J. ALAGNA

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