

No. \_\_\_\_\_

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**In the Supreme Court of the United States**

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STATE OF ALABAMA,

*Petitioner,*

v.

MICHAEL ANTHONY POWELL,

*Respondent.*

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On Petition for Writ of Certiorari to the  
Alabama Court of Criminal Appeals

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the PETITION FOR A WRIT OF CERTIORARI contains 8,477 words, excluding the parts of the document exempted from the word limits by Supreme Court Rule 33.1(d).

Executed on January 12, 2026.



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A. Barrett Bowdre  
*Counsel of Record*  
Office of the Attorney General  
State of Alabama  
501 Washington Avenue  
Montgomery, AL 36130  
(334) 242-7300  
Barrett.Bowdre@AlabamaAG.gov