

No. 25-848

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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.*

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

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that Petitioner's REPLY BRIEF contains 2,984 words, excluding the parts of the document exempted from the word limits by Supreme Court Rule 33.1(d).

Executed on March 4, 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