## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 23-1345

DANNY RICHARD RIVERS,

Petitioner,

v.

BOBBY LUMPKIN, DIRECTOR, TEXAS DEPARTMENT OF CRIMINAL JUSTICE, CORRECTIONAL INSTITUTIONS DIVISION,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Peter A. Bruland, certify that the Reply Brief For Petitioner in the foregoing case contains 2,521 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 October 29, 2024.

/s/ Peter A. Bruland
PETER A. BRULAND
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, DC 20005
(202) 736-8000