## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 23-1345

DANNY RICHARD RIVERS,

Petitioner,

v.

ERIC GUERRERO, 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 6,000 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 March 20, 2025.

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