In the Supreme Court of the United States

CHRIS DUTRA & ERIC DEJESUS,

Petitioners,

v.

KIM JACKSON,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Paul W. Hughes, counsel for respondent Kim Jackson and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this brief in opposition contains 6,345 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Paul W. Hughes