

No. 23-5038

In the Supreme Court of the United States

KURT MICHAELS, *Petitioner*,

v.

RON DAVIS, WARDEN, ET AL., *Respondent*.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition contains 4,696 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.

Dated: October 3, 2023

Respectfully submitted,

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