No. 24-421

In the Supreme Court of the United States

CYNTHIA DAVIS, WARDEN,

Petitioner,

v.

DAVID M. SMITH,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the REPLY IN SUP-PORT OF PETITION FOR WRIT OF CERTIORARI contains 1,841 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 November 26, 2024.

/s/ T. Elliot Gaiser
T. ELLIOT GAISER
Ohio Solicitor General
Counsel for Petitioner