

CERTIFICATE OF COMPLIANCE

Case No. 17-432

Caption: *China Agritech, Inc. v.
Michael H. Resh, et al.*

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,115 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 February 28, 2018.



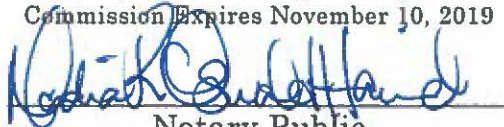
Teva Durham
Record Press, Inc.

Sworn to before me on

February 28, 2018

NADIA R. OSWALD HAMID
Notary Public, State of New York
No. 01OS6101366

Qualified in Kings County
Commission Expires November 10, 2019



Notary Public