## **Certificate of Compliance With Word Limitations**

As required by Supreme Court Rule 33.1(h), I certify that the document contains <u>4,799</u> 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 September 11, 2018.

Jonathan L. Marcus