

Record No. 18-490

JAEL WATTS,  
Petitioner,

v.


MICHAEL K. ALLEN,  
Respondent.

**CERTIFICATE OF COMPLIANCE WITH THE WORD LIMITATIONS**

I, Anthony G. Lantagne, hereby certify that the above referenced Brief in Opposition to Petition for Writ of Certiorari, as indicated by the word count feature of MS Word, and including footnotes but excluding those parts enumerated for exclusion under the rules, contains 2,066 words.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 16<sup>th</sup> day of November, 2018.

  
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COMMONWEALTH OF VIRGINIA     )  
CITY OF RICHMOND                 )     to-wit:

Anthony G. Lantagne appeared before me this 16<sup>th</sup> day of November, 2018, and attested that the foregoing certificate is true and exact to the best of his knowledge and belief.





Richard Markell