CERTIFICATE OF COMPLIANCE

Case No. 18-837

Caption: Harris v West Alabama Women's Center

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,385 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 March 4, 2019.

Samantha Collins Record Press, Inc.

Sworn to before me on

March 4, 2019

RAMIRO A. HONEYWELL Notary Public, State of New York No. 01HO6118731

Qualified in Kings County Commission Expires November 15, 2020

Notary Public