

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 18-

American Fuel & Petrochemical Manufacturers, et al.,

Petitioners,

v.

Jane O’Keeffe, et al.,

Respondents.

As required by Supreme Court Rule 33.1(h), I, Paul J. Zidlicky, certify that the Petition for a Writ of Certiorari in the foregoing case contains 8,846 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 January 7, 2019.

/s/ Paul J. Zidlicky
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