

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 19-

Airbus Helicopters, Inc.,

*Petitioner,*

v.

Mary Riggs, et al.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I, Carter G. Phillips, certify that the Petition for a Writ of Certiorari in the foregoing case contains 6,743 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 20, 2020.

/s/ Carter G. Phillips  
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