

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 19-1158

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 Reply Brief for the Petitioner in the foregoing case contains 2,988 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 June 8, 2020.

/s/ Carter G. Phillips
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