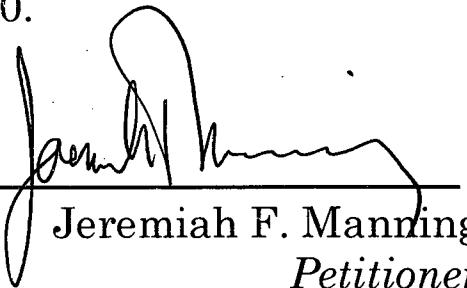


CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of the Supreme Court of the United States, I hereby certify that the accompanying Petition for Writ of Certiorari on behalf of Petitioner Jeremiah F. Manning, which was prepared using Century Schoolbook 12-point typeface, contains 4,342 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing program (Microsoft Word) used to prepare this document.

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

DATED this 7th Day of April, 2020.



Jeremiah F. Manning
Petitioner