CERTIFICATE OF COMPLIANCE

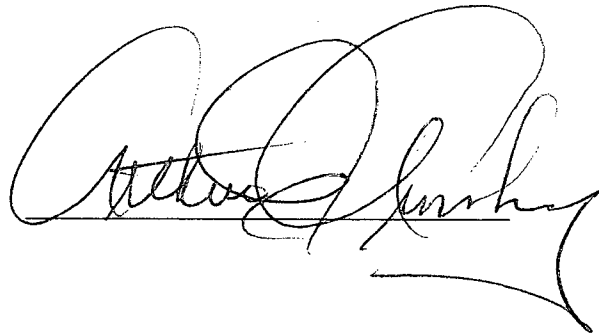No. _____

Arthur O. Armstrong,

Petitioner,

v.

City of Philadelphia and
School District of Philadelphia,

Respondents.

As required by the Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains **1,653** words, excluding the parts of the petition that are exempted by the Supreme Court Rule 33.1(d).

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

Executed on April 19, 2020.

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