

CERTIFICATE OF COMPLIANCE

No. _____

Arthur O. Armstrong,

Petitioner,

v.

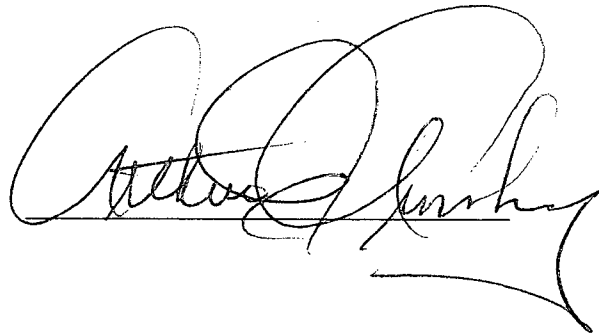
City of Philadelphia and
School District of Philadelphia,

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 foregoing is true and correct.

Executed on April 19²⁰ 2020.

A handwritten signature in black ink, appearing to read "Arthur O. Armstrong", written over a horizontal line.