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July 6, 2020

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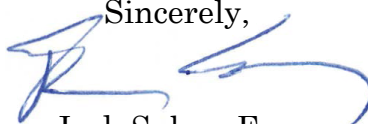
**RE 19-1341: RICHARD A. VAN AUKEN, TRUSTEE AND RICHARD A. VAN AUKEN,
BENEFICIARY V. FLETCHER R. CATRON, ESQ.; PETER F. WIRTH, ESQ.;
AND KAREN AUBREY, ESQ.**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Center for Estate Administration Reform, *et al.* referenced above contains **1,713** 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.

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 6th day of July 2020.

