IN THE Supreme Court of the United States

ANTONIO JUBIS ZACARIAS, et al., Petitioners, v.

RALPH S. JANVEY, et al. Respondents.

BARRY L. RUPERT, et al., Petitioners,

v.

RALPH S. JANVEY, as Court-Appointed Receiver for Stanford Receivership Estate, et al.

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.2(b), I hereby certify that Respondent Bowen, Miclette & Britt, Inc.'s Memorandum in Opposition is a total of four (4) pages long.

Signed on November 6, 2020.

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