

No. \_\_\_\_\_

Howard B. Bloomgarden,  
*Petitioner,*

vs.

The People of the State of California,  
*Respondent.*

**CERTIFICATE OF COMPLIANCE WITH THE WORD LIMITATIONS**

I, Anthony G. Lantagne, hereby certify that the above referenced Petition for Writ of Certiorari, as indicated by the word count feature of MS Word and including footnotes but excluding those parts enumerated for exclusion under the rules, contains 3,498 words.

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

Executed on this 19<sup>th</sup> day of June, 2020.

  
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COMMONWEALTH OF VIRGINIA      )  
CITY OF RICHMOND                  )      to-wit:

Anthony G. Lantagne appeared before me this 19<sup>th</sup> day of June, 2020, and attested that the foregoing certificate is true and exact to the best of his knowledge and belief.



Richard Markell

