

## **Certificate of Compliance**

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

David E. Olson and Absolute Environmental  
Services, Inc.,

*Petitioners,*

v.

Mark O'Brien, a resident of Alaska; James Cantor, a  
resident of Alaska; and Richard Welsh, a resident of  
Alaska,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I  
certify that the Petition for Certiorari contains 6,375  
words, excluding the parts of the Petition for  
Certiorari exempted by Supreme Court Rule 33.1(d).

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

Executed on June 9, 2020.

/s/Mario L. Bird

Mario L. Bird

*Counsel for Petitioners*