

**CERTIFICATE OF COMPLIANCE**

No.

MICHAEL RICHARDS,

*Petitioner,*

v.

COMMONWEALTH OF PENNSYLVANIA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 2,176 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

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

Executed on July 29, 2019

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