CERTIFICATE OF COMPLIANCE

Case Nos. 19-267 & 19-348

Caption: Biel & Morrisey-Berru cases

As required by Supreme Court Rule 33.1(h), I certify that the document contains 6,448 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.

Executed on February 10, 2020.

Samantha Collins Record Press, Inc.

Sworn to before me on

February 10, 2020

NADIA R. OSWALD HAMID Notary Public, State of New York No. 010S6101366

Qualified in Kings County

Commiscion Expires November 10, 2023

Votary Public