## **CERTIFICATION**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,056 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 October 7, 2019.

Jøel Edan Friedlander

Friedlander & Gorris, P.A.

1201 N. Market Street

**Suite 2200** 

Wilmington, DE 19801

(302) 573-3500

Counsel for Amicus Curiae