CERTIFICATE OF COMPLIANCE

Case No. 19-333

Caption: Arlene's Flowers v. Washinton

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,000 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 December 6, 2019.

Samantha Collins Record Press, Inc.

Sworn to before me on

December 6, 2019

JASMINE WILLIAMS
Notary Public, State of New York
No. 01WI6397949
Qualified in Queens County

Commission Expires September 16, 2023

Notary Public