CERTIFICATE OF COMPLIANCE

Case No. 19-546

Caption: King v. Brownback

As required by Supreme Court Rule 33.1(h), I certify that the document contains 6, 123 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 August 31, 2020.

Samantha Collins Record Press, Inc.

Sworn to before me on

August 31, 2020

ALESSANDRA L. KANE Notary Public, State of New York No. 01KA6340521 Qualified in Richmond County Commission Expires April 18, 2024

Notary Public