

## WORD COUNT CERTIFICATION

Undersigned counsel certifies that on this date, the 21st day of August, 2019, in compliance with Supreme Court Rules 33(g)(i), that the accompanying petition for a writ of *certiorari* is 7,479 words.

Sincerely,

A handwritten signature in blue ink, appearing to read "G. Ben Cohen", with a long horizontal flourish extending to the right.

G. Ben Cohen  
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Dated: August 21, 2019