CERTIFICATE OF COMPLIANCE

Case No. 19-783

Caption: Van Buren v. United States of America

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,798 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 July 7,2020.

Jasmine Willie Record Press, Inc.

Sworn to before me on

July 7, 2020

NADIA R. OSWALD HAMID Notary Public, State of New York No. 010S6101366 Omlified in Kings County Commission Expires November 10, 4023

Notary Public