CERTIFICATE OF COMPLIANCE

No. 19-807

BANK MELLI,

Petitioner,

vs.

MICHAEL BENNETT, et al.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the joint brief in opposition to petition for a writ of certiorari contains 8,958 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

<u>s/Nikolina Gurfinkel</u> Nikolina Gurfinkel

Sworn to on this 26th day of February, 2020