CERTIFICATE OF COMPLIANCE

Case No. 20-10

Caption: Kollaritsch, et al. v. Michigan State University Board of Trustees, et al.

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,365 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 10, 2020

Dean Misser

Record Press, Inc.

Sworn to before me on

August 10, 2020

ALESSANDRA KANE

Notary Public, State of New York

No. 01KA6340521

Qualified in Richmond County

Commission Expires April 18, 2024

Notary Public