

CERTIFICATE OF COMPLIANCE

Case No. 20-138

Caption: Donald Trump v. Sierra Club

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,469 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 September 16, 2020.



Vittorio Virili
Record Press, Inc.

Sworn to before me on

September 16, 2020

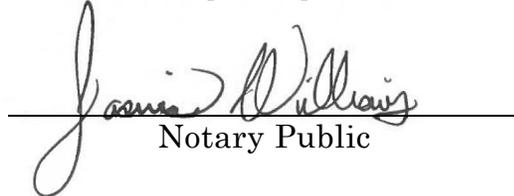
Jasmine Williams

Notary Public, State of New York

No. 01W16397949

Qualified in Queens County

Commission Expires September 16, 2023



Notary Public