CERTIFICATE OF COMPLIANCE

Case No.20-1392

Caption: Jason Fowler and Micah Perkins v.
Brittany Irish, Individually and as
Personal Representative of the Estate of
Kyle Hewitt, and Kimberly Irish

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,986 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 May 5, 2021.

Nicole Garcia

Record Press, Inc.

Sworn to before me on

May 5, 2021

ALESSANDRA KANE

Notary Public, State of New York No. 01KA6340521

Qualified in Richmond County

Commission Expires April 18, 2024

Notary Public