CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1 of the Rules of this Court, I certify that the accompanying Petition for Writ of Certiorari which was prepared using Century Schoolbook 12-point font typeface, contains 8,940 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to the prepare the document.

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

Respectfully Submitted, CHAPMAN LAW GROUP

Ronald W. Chapman II, LL.M.

1441 W. Long Lake Rd., Ste. 310

Troy, MI 48098

T: (248) 644-6326

F: (248) 644-6324

rwchapman@chapmanlawgroup.com

Counsel for Petitioner-Appellant George P. Naum III