CERTIFICATE OF COMPLIANCE

Case	No	
\circ	110.	

Caption: Melvin L. Phillips, Sr., individually and as trustee, Melvin L. Phillipa, Sr., Orchard Party v. Oneida Indian Nation

As required by Supreme Court Rule 33.1(h), I certify that the document contains 6,279 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 28, 2021.

Nicole Garcia

Record Press, Inc.

Sworn to before me on

May 28, 2021

JASMINE WILLIAMS Notary Public, State of New York No. 01WI6397949

Qualified in Queens County Commission Expires September 16, 2023

Notary Public