

No. \_\_\_\_\_

**CERTIFICATE OF COMPLIANCE**

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PATRICIA NELSON, Next friend of N.K., a minor, *Petitioner*

v.

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ESTEBAN RIVERA, *Respondent*.

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As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 4,698 words, excluding the parts of the petition 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 26, 2020.

/s/ Christopher J. Trainor  
Attorney for Petitioner