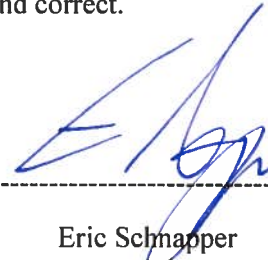


### **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply Brief for Petitioner contains 2950 words, excluding the parts of the brief 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 October 12, 2020.



Eric Schnapper  
Counsel for Petitioner