CERTIFICATE OF COMPLIANCE

Case No. 20-366

Caption: Trump v. New York

As required by Supreme Court Rule 33.1(h), I certify that the document contains 7,424 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 November 16, 2020

mine Williams

Record Press, Inc.

Sworn to before me on

November 16, 2020 ALESSANDRA KANE Notary Public, State of New York No. 01KA6340521 Qualified in Richmond County Commission Expires April 18, 2074

Notary Public