## **RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

## No. 20-481

IN RE: NYREE BELTON,

Debtor.

GE CAPITAL RETAIL BANK, Petitioner, v.

NYREE BELTON,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Joseph R. Guerra, certify that the Respondents Citigroup Inc. and Citibank, N.A.'s Brief in Support of the Petition for Certiorari in the foregoing case contains 5,610 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 13, 2020.

/s/ Joseph R. Guerra JOSEPH R. GUERRA SIDLEY AUSTIN LLP 1501 K Street, N.W. Washington, D.C. 20005 (202) 736-8000