

CERTIFICATE OF WORD COUNT

I hereby certify that Appellant's writ of certiorari, including footnotes but not including title page, table of contents, table of authorities, Appendix or Certificate of Word Count contains 4,657 words. In making this certification, I have relied on the word count of the Microsoft WORD computer software program used to prepare the brief.

DATED: Oct. 13, 2020

Respectfully submitted,

/s/ James MacDonald

James MacDonald