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1. The Respondent's Brief in Opposition to the petition for writ of certiorari complies with the word limit of Rules 33(1)(h) and 33(2)(b) because the document does not exceed 9,000 words or 40 pages.
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BY: **s/ James D. Smith**

Proof of Service

Undersigned counsel of record for the Respondent certifies that on November 4, 2020, copies of the Brief in Opposition to the petition for writ of certiorari were served on all parties required to be served as follows:

1. A copy was mailed by United States Postal Service, first class mail, addressed to the Petitioner's counsel of record:

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2. An electronic version was also transmitted on the same date to the above-named Petitioner's counsel at her email address:

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BY: **s/ James D. Smith**