

**Certificate of Word Count**

The undersigned counsel certifies that this Petition for Writ of Certiorari complies with the type-volume limitations of Supreme Court Rule 14 because the Petition contains 7,979 words. This Petition has been prepared in a proportionally spaced typeface using Microsoft Word 2010 in 14 point Century Schoolbook font.

/s/ Raphael M. Scheetz  
Raphael M. Scheetz