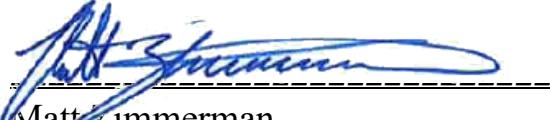


## **CERTIFICATE OF COMPLIANCE**

1. This brief complies with the type-volume limitation of SUPREME COURT RULES 33.1(g) and 33.2 because this brief contains 7374 words and/or is less than 40 pages in length, excluding the parts of the brief exempted by Rule.
2. This brief complies with the type-volume limitation of SUPREME COURT RULES 14 and 34.

Date: September 30, 2020



Matt Zimmerman