

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

No. 20-609

GANNETT CO., INC., *ET AL.*,

*Petitioners,*

v.

JEFFREY QUATRONE,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Tacy F. Flint, certify that the Supplemental Brief for Petitioners in the foregoing case contains 2,944 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 22, 2021.

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