CERTIFICATE OF COMPLIANCE

As required by the Supreme Court, I certify that Sheriff Tim Mitchell's Response to Petition for Writ of Certiorari contains 4,087 words excluding the parts of the document that are exempt.

I declare under penalty of perjury that the above and foregoing is true and correct.

Respectfully submitted this the 21th day of January, 2021.

/s/ William R. Allen (MSB#: 100541) Counsel for Sheriff Tim Mitchell (in his individual capacity)