

## CERTIFICATE OF WORD COUNT

Case No.

Case Name:

*Donovan Middleton and Harvester Nutrition, LLC, et al., v. Complete Nutrition Franchising LLC and Complete Nutrition Franchise Holdings, LLC, et al.*

Document Title:

Petition for Writ of Certiorari

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Pursuant to Rule 33.2 of the Rules of this Court, I certify that the accompanying Petition for Writ of Certiorari of Petitioners Donovan Middleton and Harvester Nutrition, LLC, et al., which was prepared using Century Schoolbook 12-point typeface, contains 8,731 words, excluding the parts of the document that are exempted by Rule 33.1(d), on less than 40 pages pursuant to Rule 33.2(b). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

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

DATED this 18<sup>th</sup> day of November, 2020.

Respectfully submitted,

/s/Jonathan E. Fortman

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