

CERTIFICATE OF COMPLIANCE

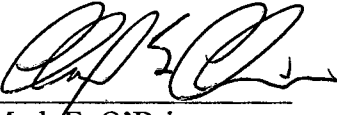
Mark E. O'Brien, *Petitioner*

v.

United Bank Trust N.A., as Trustee for LSF9 Master Participation Trust, *Respondent*

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari contains 4,180 in total, and does not exceed the word limit set by Rule 33.1(g)(i).

I declare under penalty of perjury that the foregoing is true and correct. Executed on 27 November 2020.

A handwritten signature in black ink, appearing to read 'Mark E. O'Brien', written over a horizontal line.

Mark E. O'Brien