



CERTIFICATE OF COMPLIANCE

No. 20-880

MICHAEL H. HOLLAND, AS TRUSTEE FOR THE UNITED
MINE WORKERS OF AMERICA COMBINED BENEFIT
FUND AND UNITED MINE WORKERS OF AMERICA 1992
BENEFIT PLAN, ET AL.,

Petitioners,

v.

WESTMORELAND COAL CO., ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition contains 9,000 words, excluding the parts of the Brief 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 April 16, 2021.

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: April 16, 2021

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023