SUPREME COURT OF THE UNITED STATES

No. 20-953
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MICHAEL D. ELLIS,

Petitioner,

v.

LIBERTY LIFE ASSURANCE COMPANY OF BOSTON,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 7816 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 this 18th day of March, 2021.

Melissa Pickett

Sworn to and subscribed before me this 18th day of March, 2021.

MARIA MAISONET

Notary Public State of New York

No. 01MA6204360

Qualified in Queens County

Commission Expires Apr. 20, 2021