

**CERTIFICATE OF WORD COUNT  
SUPREME COURT OF THE UNITED STATES**

**No.: 20-980**

**Veena Sharma (Petitioner)**

**v.**

**Santander Bank (Respondent)**

As Required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains less than 3000 words, excluding the parts of the petition 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 March 11, 2020.

Veena Sharma

(Veena Sharma)

COMMONWEALTH OF MASSACHUSETTS  
COUNTY OF ESSEX

On this 11 day of MAR. 2021, before me, JOSEPH FC BANBRA  
SHARMA, proved to me through satisfactory evidence of  
identification, which were VEENA SHARMA, to be the person  
whose name is signed on the preceding or attached document,  
and acknowledged to me that (he) (she) signed it voluntarily  
for its stated purpose.

Notary Public's Signature

Exp. Feb. 25, 2022