

CERTIFICATE OF COMPLIANCE

No.

VOLKSWAGEN GROUP OF AMERICA, INC., ET AL.,

Petitioners,

U.

THE ENVIRONMENTAL PROTECTION COMMISSION OF HILLSBOROUGH COUNTY, FLORIDA, AND SALT LAKE COUNTY, UTAH,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari contains 8,802 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 January 21, 2021.

Donna J. Wolf

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

Date:

Notary Public

[seal]

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