



CERTIFICATE OF COMPLIANCE

No. 20-994

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

Petitioners,

v.

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 Reply Brief for Petitioners contains 2,986 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 April 6, 2021.

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

Date: April 6, 2021

John D. Gallagher

Notary Public

[seal]



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