

In The Supreme Court of the United States

JOEL D. JOSEPH,

Petitioner,

v.

AMERICAN GENERAL LIFE INSURANCE COMPANY,

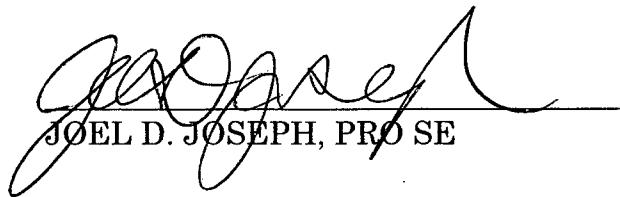
Respondent.

CERTIFICATE OF COMPLIANCE WITH WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari in this case contains 2,125 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 2, 2022.



JOEL D. JOSEPH, PRO SE