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March 11, 2022

Clerk  
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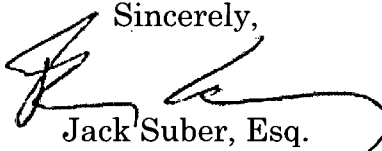
**RE: PHILIP JAY FETNER V. KEVIN R. MCCARTHY, ET AL.**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari referenced above contains **8,874** 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.

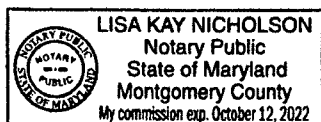
Sincerely,

  
Jack Suber, Esq.  
Principal

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Sworn and subscribed before me this 11th day of March 2022.

