

CERTIFICATE OF COMPLIANCE

Case No. 21-1389

Caption: Bates v. Trump

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,040 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.

Executed on December 20, 2023.

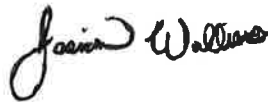


Samantha Collins
Record Press, Inc.

Sworn to before me on

December 20, 2023

JASMINE WILLIAMS
Notary Public, State of New York
No. 01WI6397949
Qualified in Queens County
Commission Expires September 16, 2027



Notary Public