

CERTIFICATE OF COMPLIANCE

No. 21-196

SNH SE Ashley River Tenant, LLC, et al.

Petitioners

v.

Thayer W. Arredondo, as Personal Representative of the Estate of
Hubert Whaley, deceased,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that Respondent's Brief in Opposition contains 6336 words, excluding the parts of the brief 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 November 1, 2021.

/s/ Nandan M. Joshi