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November 12, 2021

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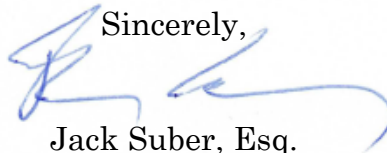
**RE 21-196: SNH SE ASHLEY RIVER TENANT, LLC, ET AL. V. THAYER W. ARREDONDO, AS PERSONAL REPRESENTATIVE OF THE ESTATE OF HUBERT WHALEY, DECEASED**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner referenced above contains **3,000** 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



Sworn and subscribed before me this 12th day of November 2021.

