

CERTIFICATE OF COMPLIANCE

No. 21-214

SHANTUBHAI N. SHAH,

Petitioner

v.

MEIER ENTERPRISES, INC.,

Respondent

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition to Writ of Certiorari contains 2881 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 September 29, 2021

A handwritten signature in black ink, appearing to read 'Rebecca A. Watkins', written over a horizontal line.

Rebecca A. Watkins
Counsel of Record for Respondent