

**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



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Rebecca A. Watkins  
Counsel of Record for Respondent