CERTIFICATE OF COMPLIANCE

Case No.

Caption: Smith v. Dunn

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,420 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 October 18, 2021.

Samantha Collins Record Press, Inc.

Sworn to before me on

October 18, 2021

NADIA R. OSWALD HAMID Notary Public, State of New York No. 01OS6101366 Qualified in Kings County Commission Expires November 10, 2023

Notary Public