

## CERTIFICATE OF COMPLIANCE

No. \_\_\_\_\_

MICHAEL B. ELLIS and ROBERT A. McNEIL,  
*Petitioners*

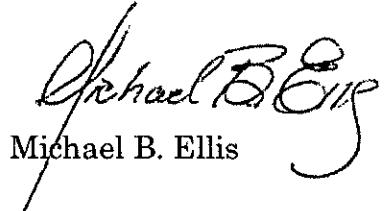
v.

AMY BERMAN JACKSON, et al.,  
*Respondent*

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 5,474 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 October 18, 2021.



Michael B. Ellis



Robert A. McNeil

