CERTIFICATE OF COMPLIANCE

No. 21-

SUSAN ELAINE DEVINE, Petitioner,

v.

ABSOLUTE ACTIVIST VALUE MASTER FUND LIMITED, et al., Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 6,133 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 26, 2021

IAN M. COMISKY