

CERTIFICATE OF COMPLIANCE-

No: \_\_\_\_\_

JONATHAN CARVALHO,  
Petitioner

v.

STEPHEN KENNEWAY,  
Respondent

As required by Supreme Court Rule 33.1(h),

I certify that the petition for writ of  
certiorari contains <4000 words, exclud-  
ing the parts of the petition that are ex-  
empted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that  
the foregoing is true and correct.

Executed on March 9, 2022

  
Jonathan Carvalho