

## CERTIFICATE OF COMPLIANCE

I hereby certify that Mr. Gerrans' Petition for a Writ of Certiorari complies with the type-volume limitation in Supreme Court Rule 33.2(a) and (b) because the body of the Petition is less than 40 pages, specifically is 34 pages. While it does not appear to counsel that she is required to comply with the requirements of Rule 33.1(b) and (g), in an abundance of caution, this brief so complies because it contains 8,983 words and is submitted in 12-point Century font.

Date: June 9, 2022

LAW OFFICES OF SHAWN HALBERT

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Shawn Halbert

On Behalf of Defendant Lawrence J. Gerrans