

Case No. 22-1215

**CERTIFICATE OF WORD COUNT**

Case Name:

John P. Fitzgerald, III v. Darren Delafield

Document Title:

Reply to Brief in Opposition to Petition for Writ of Certiorari

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply to Brief in Opposition to Petition for Writ of Certiorari, which was prepared using Century Schoolbook 12-point typeface, contains 2,981 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the wordprocessing system (Microsoft Word) used to prepare the document. I declare under penalty of perjury that the foregoing is true and correct.

DATED this 19th day of October 2023.

*Darren Delafield*  
/s/ Darren T. Delafield

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