

**CERTIFICATE OF COMPLIANCE**

No. 22-

Ayyakkannu Manivannan,

*Petitioner,*

v.

Department of Energy,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that this petition for a writ of certiorari contains 5,131 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 August 15, 2022.

/s/ John J. Powell

John J. Powell

*Counsel for Petitioner*