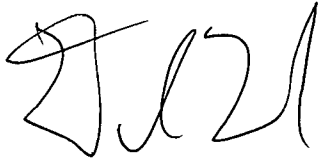


CERTIFICATE OF WORD COUNT

I hereby certify, in accordance with Supreme Court Rules that the Petition for a Writ of Certiorari in Fennell v Bonta is within the requisite word and page limits set by the Court for such documents in that the document in page length counting those items required to be under the 40 page limit..

Total word count is 2699.

A handwritten signature in black ink, appearing to read 'DF', written in a cursive style.

David Fennell

Petitioner

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