

CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Petition for Writ of Certiorari in Kamal v. Joseph Farrow et al; complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 4678 words, based on the word-count function of Microsoft Word, including foot-notes and excluding material not required to be counted by Rule 33(d).

A handwritten signature in cursive script, appearing to read 'Kamal', is written above a horizontal line.

Karim C. Kamal