

CERTIFICATE OF COMPLIANCE

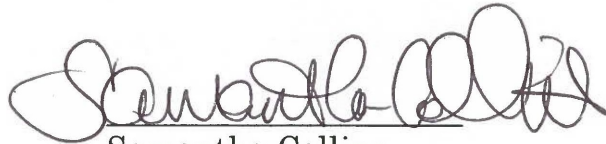
Case No. _____

Caption: Phillips v. Oneida Nation

As required by Supreme Court Rule 33.1(h),
I certify that the document contains 5,258 words,
excluding the parts of the document 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 June 12, 2024.



Samantha Collins
Record Press, Inc.

Sworn to before me on

June 12, 2024

NADIA R. OSWALD HAMID
Notary Public, State of New York
No. 01OS6101366

Qualified in Kings County
Commission Expires November 10, 2027



Notary Public