

CERTIFICATE OF COMPLIANCE

No. 23-441

Patrick Fehlman,

Petitioner,

v.

James Mankowski

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief in Support of Writ of Certiorari contains 1,180 words, excluding the parts of the Brief 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 this 11th day of December, 2023.

A handwritten signature in dark ink, appearing to read 'P. Kinne', is written over a horizontal line that extends across the page.

PAUL A. KINNE

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