

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 23-

Geoffrey Hamilton Woodward,

*Petitioner,*

v.

Sara Edge Woodward,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Carter G. Phillips, certify that the Petition For A Writ Of Certiorari in the foregoing case contains 3,634 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 October 3, 2023.

/s/ Carter G. Phillips  
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