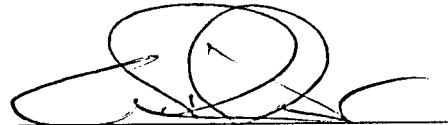


**CERTIFICATE OF WORD COUNT**

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of Professional Liability Respondents which was prepared using Century Schoolbook 12-point typeface contains 2267 words, excluding the parts of the document that are exempted by Rule 33.1(d). This Certificate was prepared in reliance on the wordcount function of the word processing system (Microsoft Word) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

Date: October 18, 2023



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