

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

No. 19-309

John C. Carney, Governor of Delaware,

*Petitioner,*

v.

James R. Adams,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Virginia A. Seitz, certify that the Brief of *Amici Curiae* Former Chief Justices of the Delaware Supreme Court in Support of Petitioner in the foregoing case contains 4,514 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 7, 2019.

/s/ Virginia A. Seitz  
VIRGINIA A. SEITZ  
SIDLEY AUSTIN LLP  
1501 K Street, N.W.  
Washington, D.C. 20005  
(202) 736-8000