

**CERTIFICATE OF COMPLIANCE**

Case No. 19-897

Caption: *Pham v. Chavez, et al.*

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,314 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 November 10, 2020

  
Vittorio Virili  
*Record Press, Inc.*

Sworn to before me on

November 10, 2020

ALESSANDRA KANE

Notary Public, State of New York

No. 01KA6340521

Qualified in Richmond County

Commission Expires April 18, 2024



Notary Public