

**CERTIFICATE OF COMPLIANCE**

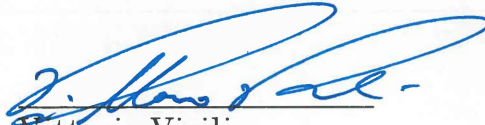
Case No. 19-897

Caption: *Pham v. Chavez*

As required by Supreme Court Rule 33.1(h), I certify that the document contains 7,993 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 12, 2020



Vittorio Virili  
*Record Press, Inc.*

Sworn to before me on

November 12, 2020

ALESSANDRA KANE

Notary Public, State of New York

No. 01KA6340521

Qualified in Richmond County  
Commission Expires April 18, 2024



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Notary Public