

**CERTIFICATE OF COMPLIANCE**

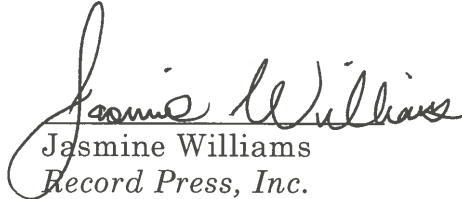
Case No. 20-138

Caption: *Trump v. Sierra Club*

As required by Supreme Court Rule 33.1(h), I certify that the document contains 12,522 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.

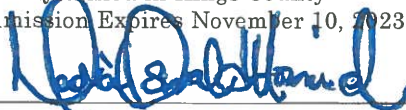
Executed on January 12, 2021

  
Jasmine Williams  
*Record Press, Inc.*

Sworn to before me on

January 12, 2021

NADIA R. OSWALD HAMID  
Notary Public, State of New York  
No. 01OS6101366  
Qualified in Kings County  
Commission Expires November 10, 2023



Notary Public