

**CERTIFICATE OF COMPLIANCE**

Case No. 20-138

Caption: *Donald J. Trump v. Sierra Club, et al.*

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,543 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 19, 2021



Howard Daniels  
*Record Press, Inc.*

Sworn to before me on

January 19, 2021

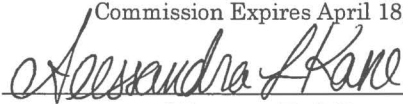
ALESSANDRA KANE

Notary Public, State of New York

No. 01KA6340521

Qualified in Richmond County

Commission Expires April 18, 2024



Notary Public