

CERTIFICATE OF COMPLIANCE

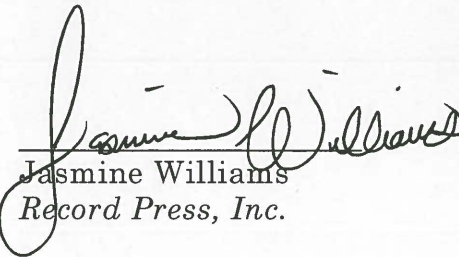
Case No. 20-366

Caption: *Trump v. New York*

As required by Supreme Court Rule 33.1(h), I certify that the document contains 12,990 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 16, 2020

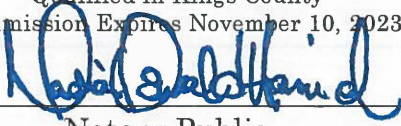


Jasmine Williams
Record Press, Inc.

Sworn to before me on

November 16, 2020

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



Notary Public