



**CERTIFICATE OF COMPLIANCE**

No. 20-994

VOLKSWAGEN GROUP OF AMERICA, INC., ET AL.,

*Petitioners,*

v.

THE ENVIRONMENTAL PROTECTION COMMISSION OF  
HILLSBOROUGH COUNTY, FLORIDA AND SALT LAKE  
COUNTY, UTAH,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the Respondents in Opposition contains 8,947 words, excluding the parts of the Petition 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 March 18, 2021.

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Emily Mullins  
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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: March 18, 2021

John D. Gallagher

Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023