## TRISTRAM P. HEINZ, ESQUIRE PRO-SE PETITIONER

v,

## CITY OF PHILADELPHIA RESPONDENT

## **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains approximately 4115 words, excluding the parts of the Petition that are exempted by Supreme Court Rule 33.1(d).

In accordance with Rule 29.5(c), I declare under penalty of perjury, pursuant to 28 U.S.C. §1746, that the foregoing is true and correct.

Executed on August 8, 2025

Tristram P. Heinz, Esq.