

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. \_\_\_\_\_

Alfredo Ramon Cerda,

*Petitioner,*

v.

W.Z. Jenkins, II, and David M. Singer,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I, Andrew B. Talai, hereby certify that the Petition for a Writ of Certiorari in the foregoing case contains 5,343 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 October 14, 2025.

/s/ Andrew B. Talai

Andrew B. Talai

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