

**CERTIFICATE OF WORD COUNT**

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Petition for a Writ of Certiorari, which was prepared in Century 12-point typeface, contains 8,408 words, including footnotes, excluding the parts of this document that are exempted by Rule 33.1(d).

This certificate was prepared in reliance on the word-count function of the Flesch Reading Program, part of the Microsoft Word application used to generate this brief.

Submitted by,

A handwritten signature in black ink, appearing to read "Rick Siegel", written in a cursive style.

Rick Siegel