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December 18, 2018

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE: DEBORAH J. DAVIS, AND IN BEHALF OF DECEASED SPOUSE, FRANK H. DAVIS, JR. V. MEHUL BHATT, M.D.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari referenced above contains 3,672 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Arthur D. Chotin, Esq.

Principal