

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 23-914

DIANE ZILKA,

Petitioner,

v.

TAX REVIEW BOARD CITY OF PHILADELPHIA,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Carter G. Phillips, certify that the Reply Brief of Petitioner in the foregoing case contains 2,688 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 May 9, 2024.

/s/ Carter G. Phillips
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