CERTIFICATION OF COMPLIANCE

I hereby certify on this 8th day of May, 2020, that Defendant's Objections to Magistrate Judge's April 24, 2020 Order complies with this Court's type, font and word limitations. The text of the brief, including footnotes, was prepared in Times New Roman, 14 point font. According to Microsoft Word, the brief contains 2,438 words, excluding any case caption, signature block, or certifications.

Dated: May 8, 2020

/s/ Katharine L. Mowery Katharine L. Mowery (#5629)

