



**CERTIFICATE OF COMPLIANCE**

No. 16-1011

WESTERNGECO LLC,

*Petitioner,*

v.

ION GEOPHYSICAL CORPORATION,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae American Intellectual Property Law Association in Support of Neither Party contains 4,479 words, excluding the parts of the Petition 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 March 5, 2018.

Donna J. Wolf  
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Cincinnati, OH 45249  
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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: March 5, 2018

John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023