

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 16-1498

Washington State Department of Licensing,

Petitioner,

v.

Cougar Den, Inc.,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Virginia A. Seitz, certify that the Brief of *Amicus Curiae* National Congress of American Indians in Support of Respondent in the foregoing case contains 5,021 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 September 24, 2018.

/s/ Virginia A. Seitz
VIRGINIA A. SEITZ
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, DC 20005
(202) 736-8000