

No. 17-1042

IN THE
Supreme Court of the United States

BNSF RAILWAY COMPANY,
Petitioner,

v.

MICHAEL D. LOOS,
Respondent.

CERTIFICATE OF COMPLIANCE

I, Jeffrey R. White, a member of the Bar of this Court, hereby certify, pursuant to Supreme Court Rule 33.1(h), that the brief of the American Association for Justice as *amicus curiae* in support of Respondent in the above-captioned case contains 8,249 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

September 17, 2018.



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