



**CERTIFICATE OF COMPLIANCE**

No. 17-1042

BNSF RAILWAY COMPANY,

*Petitioner,*

v.

MICHAEL D. LOOS,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* SMART (The International Association of Sheet Metal, Air, Rail, and Transportation Workers) and ARLA (The Academy of Rail Labor Attorneys) Supporting Respondent contains 1,729 words, excluding the parts of the Brief 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 17, 2018.

Julie A. Kershner  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: September 17, 2018

John D. Gallagher  
Notary Public

[seal]



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