IN THE

Supreme Court of the United States

AIR AND LIQUID SYSTEMS CORP., et al.,

Petitioners,

v.

ROBERTA G. DEVRIES,
Individually and as Administratrix of the
Estate of John B. DeVries, Deceased, et al.,
Respondents.

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 8,060 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

August 27, 2018.

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