IN THE SUPREME COURT OF THE UNITED STATES

No. 17-1307

DENNIS OBDUSKEY, PETITIONER

v.

MCCARTHY & HOLTHUS LLP, ET AL.

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Kannon K. Shanmugam, counsel for respondent McCarthy & Holthus LLP and a member of the Bar of this Court, certify that the Brief for Respondent McCarthy & Holthus LLP in the above-captioned case contains 14,057 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Kannon K. Shanmugam

November 7, 2018