## **CERTIFICATE OF COMPLIANCE**

## No. 17-1354

Erick Gelhaus,

*Petitioner(s)*,

v.

Estate of Andy Lopez, By and Through Successors in Interest, Rodrigo Lopez and Sujay Cruz, et al.,

Respondent(s).

STATE OF MASSACHUSETTS ) COUNTY OF NORFOLK ) SS.:

Being duly sworn, I depose and say:

1. That I am over the age of 18 years and am not a party to this action. I am an employee of the Supreme Court Press, the preparer of the document, with mailing address at 1089 Commonwealth Avenue, Suite 283, Boston, MA 02446.

2. That, as required by Supreme Court Rule 33.1(h), I certify that the PEACE OFFICERS AMICI CURIAE BRIEF AT PETITION STAGE contains 4177 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Lucas DeDeus

April 26, 2018

SCP Tracking: Rains-2300 Contra Costa Blvd., Suite 500-Cover Cream