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April 26, 2018

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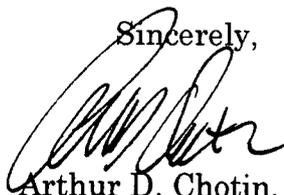
**RE: No. 17- 1354: ERICK GELHAUS V. ESTATE OF ANDY LOPEZ, BY AND THROUGH
SUCCESSORS IN INTEREST, RODRIGO LOPEZ AND SUJAY CRUZ,
ET AL.**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Force Litigation Consulting, LLC and Gregory Connor Consulting Inc. in Support of Petitioner referenced above contains **5,027** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Arthur D. Chotin, Esq.
Principal