CERTIFICATE OF COMPLIANCE

No. 17-1702

In the

Supreme Court of the United States

MANHATTAN COMMUNITY ACCESS CORPORATION, et al., Petitioners,

v. DEEDEE HALLECK, et al., Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief Amicus Curiae of Pacific Legal Foundation in Support of Petitioners contains 5,570 words, excluding the parts of the document 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 December 11, 2018.

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