CERTIFICATE OF COMPLIANCE

No. 17-1713

Emerson Electric Co., et al.,

Petitioners,

v.

Superior Court of California, Orange County, et al.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Chamber of Commerce of the United States of America as *Amicus Curiae* in Support of Petitioners contains 3,946 words, excluding the parts of the Brief 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 July 27, 2018.

Hyland Hunt