

DONNA J. WOLF, J.D. JULIE A. KERSHNER, J.D.

CERTIFICATE OF COMPLIANCE

No. 17-269

STATE OF WASHINGTON,

Petitioner,

v.

UNITED STATES OF AMERICA, et al.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Law Professors in Support of Respondents contains 8,438 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 April 2, 2018.

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BECKER GALLAGHER LEGAL PUBLISHING INCORPORATED (800) 890.5001 www.beckergallagher.com 8790 Governor's Hill Drive Suite 102 Cincinnati, Ohio 45249 International Square 1875 I Street, NW, 5th Floor Washington, DC 20006 Sworn to and subscribed before me by said Affiant on the date designated below.

Ipil 2018 Date: 27 Jon Notary Public [seal]



JULIE ANNE KERSHNER Notary Public, State of Ohio My Commission Expires February 21, 2023