IN THE

Supreme Court of the United States

CHINA AGRITECH, INC.,

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Petitioner,

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MICHAEL RESH, ET AL.,

Respondents.

On Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

CERTIFICATE OF COMPLIANCE

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January 29, 2018

CERTIFICATION

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the Securities Industry and Financial Markets Association as Amicus Curiae in Support of Petitioner contains 5,950 words, excluding the parts of the brief that are exempted by this Court's Rule 33.1(d).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 29, 2018

Lewis J. Liman

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