No. 17-432

IN THE

Supreme Court of the United States

CHINA AGRITECH, INC.,

Petitioner,

v.

MICHAEL RESH, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief for the Chamber of Commerce of the United States, Retail Litigation Center, Inc., and the American Tort Reform Association as *Amici Curiae* in Support of Petitioner contains 6,707 words and complies with the word limitation established by Rule 33.1(g)(xi) of the Rules of this Court.

Dated: January 29, 2018

Mark A. Perry