No. 17-432

IN THE SUPREME COURT OF THE UNITED STATES

CHINA AGRITECH, INC.,

Petitioner,

v.

MICHAEL H. RESH, ET AL.,

Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the accompanying Brief of Amicus Curiae Public Citizen, Inc., in Support of Respondents contains 4,802 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on February 27, 2018.

Scott I Ulan

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