



CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 40 copies of the foregoing Brief of *Amici Curiae* American Association for Justice and National Consumer Law Center in Support of the Respondents in 17-432, *China Agritech, Inc. v. Michael H. Resh, et al.*, were sent via Two Day Service to the U.S. Supreme Court, and 3 copies were sent via Two Day Service and e-mail to the following parties listed below, this 28th day of February, 2018:

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All parties required to be served have been served.

I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on February 28, 2018.

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Subscribed and sworn to before me by the said Affiant on the date below designated.

Date: February 28, 2018
John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
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My Commission Expires
February 14, 2023