IN THE SUPREME COURT OF THE UNITED STATES

No. 17-571

FOURTH ESTATE PUBLIC BENEFIT CORP.,

Petitioner,

v.

WALL-STREET.COM, LLC, AND JERROLD D. BURDEN,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Cory L. Andrews, counsel for amicus curiae Washington Legal Foundation (WLF) and a member of the Bar of this Court, certify under Supreme Court Rules 33.1(g) and (h) that WLF's brief in this case contains 4,697 words, excluding those parts of the brief exempted by Supreme Court Rule 33.1(d).

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Dated: October 18, 2018