## In the Supreme Court of the United States

THEODORE H. FRANK AND MELISSA ANN HOLYOAK.

Petitioners,

V.

PALOMA GAOS, on behalf of herself and all others similarly situated, et al.,

Respondents.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Center for Individual Rights as *Amicus Curiae* in Support of Petitioners contains 1906 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 6, 2018.

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