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.*

On Petition For A Writ Of Certiorari
To The United States Court of Appeals For The Ninth Circuit

CERTIFICATE OF WORD COUNT

Pursuant to Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioners filed in this matter contains 2,994 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dated: March 22, 2018

Andrew M. Grossman BAKERHOSTETLER LLP

1050 Connecticut Ave., N.W., Suite 1100

Washington, D.C. 20036

 $(202)\ 861-1697$

agrossman@bakerlaw.com