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 2346 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 July 12, 2018.

MICHAEL E. ROSMAN COUNSEL OF RECORD

CENTER FOR INDIVIDUAL RIGHTS

1100 Connecticut Ave, NW

Suite 625

Washington, DC 20036

(202) 833-8400

rosman@cir-usa.org

Counsel for Amicus Curiae Center for Individual Rights