CERTIFICATE OF COMPLIANCE

Case No. 17-961

Caption: Theodore H. Frank and Melissa Ann Holyoak v. Paloma Gaos, on behalf of herself and all others similarly situated, et al.

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3,723 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 September 5, 2018.

Anne Lamb

Record Press, Inc.

Sworn to before me on

September 5, 2018

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Commission Expires November 15, 2020

Notary Public