In the Supreme Court of the United States

Lamps Plus, Inc., Lamps Plus Centennial, Inc., Lamps Plus Holdings, Inc.,

Petitioners,

V.

FRANK VARELA,

Respondent.

CERTIFICATE OF SERVICE

I, Andrew J. Pincus, counsel for Petitioners Lamps Plus, Inc. et al. and a member of the Bar of this Court, certify that on this 1st day of October, 2018, I caused three copies of the Reply Brief for Petitioners in the above-captioned case to be served by overnight delivery on the following:

MICHELE M. VERCOSKI RICHARD D. MCCUNE McCune Wright Arevalo, LLP 3281 East Guasti Road, Suite 100 Ontario, CA 91761 (909) 557-1250 SCOTT L. NELSON ALLISON M. ZIEVE Public Citizen Litigation Group 1600 20th Street NW Washington, DC 20009 (202) 588-1000

Counsel for Respondent

I further certify that all parties required to be served have been served.

ANDREW J. PINCUS
Mayer Brown LLP
1999 K Street, NW
Washington, DC 20006
apincus@mayerbrown.com

(202) 263 - 3000