

IN THE SUPREME COURT OF THE UNITED STATES

No. 18-1140

AVCO CORPORATION, PETITIONER

v.

JILL SIKKELEE

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Amy Mason Saharia, counsel for petitioner and a member of the Bar of this Court, certify that the Supplemental Brief for Petitioner in the above-captioned case contains 2,960 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Amy Mason Saharia
Amy Mason Saharia

December 23, 2019