

IN THE SUPREME COURT OF THE UNITED STATES

---

No.

AVCO CORPORATION, PETITIONER

v.

JILL SIKKELEE

---

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

---

I, Kannon K. Shanmugam, counsel for petitioner and a member of the Bar of this Court, certify that the Petition for a Writ of Certiorari in the above-captioned case contains 8,985 words, excluding the parts of the petition that are exempted by Rule 33.1(d).

Kannon K. Shanmugam

March 1, 2019