

No. 18-1140

In The
Supreme Court of the United States

AVCO CORPORATION,
Petitioner,

v.

JILL SIKKELEE,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Matthew G. Berard, a member of the bar of this Court, certify on this 22nd day of April, 2019, that the Brief of DRI—The Voice of the Defense Bar, *amicus curiae* supporting the Petitioner contains 4,453 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

I certify under penalty of perjury that the foregoing is true and correct.

Executed on April 22, 2019.



Matthew G. Berard