## 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, JONATHAN M. HOFFMAN, counsel for Amici Curiae Product Liability Advisory Council, Inc. and National Association of Manufacturers, and a member of the Bar of this Court, certify that the Brief of the Product Liability Advisory Council, Inc. and National Association of Manufacturers as Amici Curiae in Support of Petitioner in the above-captioned case contains 5,861 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Date: April 22, 2019.

Jonathan M. Hoffman MB Law Group, LLP