

IN THE SUPREME COURT OF THE UNITED STATES

No. 18-1437

WINSTON & STRAWN LLP,

Petitioner,

v.

CONSTANCE RAMOS; THE SUPERIOR COURT OF
SAN FRANCISCO COUNTY,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Corbin K. Barthold, counsel for *amicus curiae* Washington Legal Foundation and a member of the Bar of this Court, certify under Supreme Court Rule 33(g) and (h) that WLF's brief complies with the word limits imposed by those rules. According to the word-processing software used to prepare the brief (Microsoft Word 2010), the brief's word count is 5,172 excluding the cover, table of contents, table of authorities, and signature block.



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