



**CERTIFICATE OF COMPLIANCE**

No. 18-1437

WINSTON & STRAWN LLP,

*Petitioner,*

v.

CONSTANCE RAMOS; THE SUPERIOR COURT OF  
SAN FRANCISCO COUNTY,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amici Curiae the Civil Justice Association of California and the Association of Southern California Defense Counsel in Support of Petitioner contains 3,915 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

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

Executed on June 17, 2019.

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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: June 17, 2019

John D. Gallagher  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023