

## **CERTIFICATE OF SERVICE**

I, Donna J. Wolf, hereby certify that 1 unbound and 40 copies of the foregoing Brief of Amici Curiae the Civil Justice Association of California and the Association of Southern California Defense Counsel in Support of Petitioner in 18-1437, Winston & Strawn LLP v. Constance Ramos; The Superior Court of San Francisco County, were sent via Three Day Service to the U.S. Supreme Court, and 3 copies were sent via Three Day Service and e-mail to the following parties listed below, this 17th day of June, 2019:

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All parties required to be served have been served.

I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on June 17, 2019.

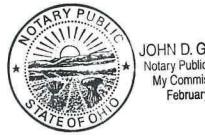
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Subscribed and sworn to before me by the said Affiant on the date below designated.

Date: Ame 17, 2019 Am D. Duly Notary Public

[seal]



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