

No. 18-1437

IN THE

Supreme Court of the United States

WINSTON & STRAWN LLP,
Petitioner,

v.

CONSTANCE RAMOS; THE SUPERIOR COURT OF
SAN FRANCISCO COUNTY,
Respondents

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of the Atlantic Legal Foundation contains 3,434 words, excluding the parts of the document 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

s/ Martin S. Kaufman
Martin S. Kaufman