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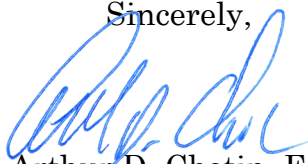
**RE NO. 18-1437: WINSTON & STRAWN LLP V. CONSTANCE RAMOS; THE SUPERIOR
COURT OF SAN FRANCISCO COUNTY**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Petitioner's Reply Brief referenced above contains **2,994** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Arthur D. Chotin, Esq.
Principal