

## CERTIFICATE OF COMPLIANCE

No. 18-281

VIRGINIA HOUSE OF DELEGATES, M. KIRKLAND COX,

Appellants,

v.

GOLDEN BETHUNE-HILL, et al.,

Appellees.

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amici Curiae* of the American Legislative Exchange Council, Lawyers Democracy Fund, and State Government Leadership Foundation in Support of Appellants on Issue of Standing contains 5,002 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 January 4, 2019.

Donna J. Wolf

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

Date

Notary Public

[seal]



JULIE ANNE KERSHNER
Notary Public, State of Ohio
My Commission Expires
February 21, 2023