

**CERTIFICATE OF COMPLIANCE**

No. 18-389

Parker Drilling Management Services, Ltd.,

Petitioner,


v.

Brian Newton,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Chamber of Commerce of the United States of America as *Amicus Curiae* in Support of Petitioner contains 3,051 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 October 26, 2018.

  
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Hyland Hunt