No. 18-457

IN THE SUPREME COURT OF THE UNITED STATES

NORTH CAROLINA DEPARTMENT OF REVENUE,

Petitioner,

V.

THE KIMBERLEY RICE KAESTNER 1992 FAMILY TRUST

Respondent.

ON WRIT OF CERTIORARI TO THE SUPREME COURT OF NORTH CAROLINA

WORD-COUNT CERTIFICATE

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the Respondent contains 14,999 words, excluding the parts of the brief exempted by Supreme Court Rule 33.1(d), and therefore complies with applicable word limitations. This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 2010) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 18, 2019.

Laura E. O'Neill

DEBEVOISE & PLIMPTON LLP 801 Pennsylvania Ave. N.W. Washington, D.C. 20004

(200) 200 2000

(202) 383-8000

Subscribed and swom before me this 18" day of March, 2019.

Davleve R. Diffice

DARLENE R. DIFFEE
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires April 30, 2019