## IN THE SUPREME COURT OF THE UNITED STATES

 ${$\hbox{No. 18-472}$}$  BEHR DAYTON THERMAL PRODUCTS LLC, ET AL., Petitioners,

v.

TERRY MARTIN, ET AL., Respondents.

## CERTIFICATE OF COMPLIANCE WITH RULE 33.1(g)

I, Andrew J. Pincus, counsel for *amici curiae*, hereby certify that, according to the word-count tool in Microsoft Word, the Brief of the Chamber of Commerce of the United States of America, American Tort Reform Association, and National Association of Manufacturers as *Amici Curiae* in Support of Petitioners consists of 4,317 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The Brief therefore complies with Rule 33.1(g).

Andrew J. Pincus Mayer Brown LLP 1999 K Street, N.W. Washington, D.C. 20006-1101 (202) 263-3000 apincus@mayerbrown.com