

WORD COUNT CERTIFICATION

I hereby certify that the foregoing brief, from the beginning of the text on page numbered 3, to the signature block, contains 492 words.

Dated this SEPTEMBER 25, 2018

CANN LAWYERS, A PROFESSIONAL CORPORATION

/s/ Frederic Cann
FREDERIC CANN, Oregon State Bar #781604
Member of the Bar of the United States Supreme Court
Attorney for Respondent Minh Duy Tran