

No. 18-747

**In the Supreme Court of the United States**

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SONJA RITTER

Petitioner

v.

LOIS BRADY, Chapter 7 Trustee

Respondent

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On Petition for Writ of Certiorari  
to the United States Court of Appeals for the Ninth Circuit

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), we certify that the Brief of Professor Margaret Howard as Amica Curiae in Support of Petitioner contains 5,624 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on January 7, 2019.

/s/ Margaret Howard

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