CERTIFICATE OF COMPLIANCE

Docket No. 18-84 ConAgra Grocery Products Company, et al. v. The People of California

As required by Supreme Court Rule 33.1(h), I certify that the Brief Amicus Curiae of Pacific Legal Foundation In Support of Petitioner contains 4,668 words, excluding the parts of the document 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 August 16, 2018.

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