

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 18-881

American Fuel & Petrochemical Manufacturers, et al.,

*Petitioners,*

v.

Jane O’Keeffe, et al.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I, Paul J. Zidlicky, certify that the Reply Brief in the foregoing case contains 2,992 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 April 22, 2019.

/s/ Paul J. Zidlicky  
PAUL J. ZIDLICKY  
SIDLEY AUSTIN LLP  
1501 K Street, N.W.  
Washington, DC 20005  
(202) 736-8000