No. 19-368 & 19-369

IN THE

Supreme Court of the United States

FORD MOTOR COMPANY,

Petitioner,

v.

MONTANA EIGHTH JUDICIAL DISTRICT COURT, ETAL.,

Respondents.

FORD MOTOR COMPANY,

Petitioner,

v.

ADAM BANDEMER,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief of Washington Legal Foundation as *Amicus Curiae* in Support of Petitioner in *Ford Motor Company v. Montana Eighth Judicial District Court*, No. 19-368, and *Ford Motor Company v. Bandemer*, No. 19-369, complies with the word limitations, as it contains 4,841 words.

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

Date: March 6, 2020

Amanda K. Rice