## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

Nos. 19-368 & 19-369

FORD MOTOR COMPANY,

Petitioner,

v.

MONTANA EIGHTH JUDICIAL DISTRICT COURT, ET AL.,

Respondents.

FORD MOTOR COMPANY,

Petitioner,

v.

ADAM BANDEMER,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Virginia A. Seitz, certify that the Brief of the Pharmaceutical Research and Manufacturers of America (PhRMA) as *Amicus Curiae* in Support of Petitioner in the foregoing case contains 5,853 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 March 6, 2020.

/s/ Virginia A. Seitz VIRGINIA A. SEITZ SIDLEY AUSTIN LLP 1501 K Street, N.W. Washington, D.C. 20005 (202) 736-8000