In the Supreme Court of the United States

FORD MOTOR COMPANY,

Petitioner,

MONTANA EIGHTH JUDICIAL DISTRICT COURT, et al., Respondents.

FORD MOTOR COMPANY,

Petitioner.

v. ADAM BANDEMER, Respondent.

On Writs of Certiorari to the Supreme Court of Montana and Minnesota

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the *Brief for Amicus Curiae Jonathan R. Nash in Support of Respondents* contains 1,882 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 2, 2020.

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