

## CERTIFICATE OF COMPLIANCE

No. 19-875

OTO, L.L.C.,

Petitioner,

v.

KEN KHO, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Civil Justice Association of California as Amicus Curiae in Support of Petitioner contains 3,692 words, excluding the parts of the Brief 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 February 14, 2020.

Julie A. Kershner

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Sworn to and subscribed before me by said Affiant on the date designated below.

Date: February 14, 2020

John Delela

Notary Public

[seal]

JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires February 14, 2023