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No. 19-988

LIVING ESSENTIALS, LLC;  
INNOVATION VENTURES, LLC,  
Petitioners,

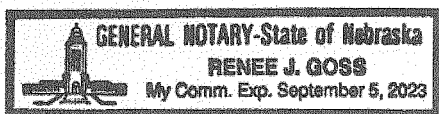
v.

STATE OF WASHINGTON,  
Respondent.

### CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF AMICI CURIAE GOLDWATER INSTITUTE, CATO INSTITUTE, AND REASON FOUNDATION IN SUPPORT OF PETITIONERS in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 4825 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 11th day of March, 2020.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
\_\_\_\_\_  
Notary Public

*Andrew H. Cagle*  
\_\_\_\_\_  
Affiant