IN THE SUPREME COURT OF THE UNITED STATES

No. 20-219

JANE CUMMINGS,

Petitioner,

v.

PREMIER REHAB KELLER, P.L.L.C.,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify under Supreme Court Rules 33.1(g) and (h) that Washington Legal Foundation's brief in this case contains 4,941 words, excluding those portions of the brief exempted by Supreme Court Rule 33.1(d).

Counsel for Amicus Curiae

October 5, 2021