No. 20-219

JANE CUMMINGS,

Petitioner,

V.

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

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Howard N. Slugh, a member of the Supreme Court Bar, certify that the BRIEF OF AMICI CURIAE THE CHAMBER OF COMMERCE OF THE UNITED STATES OF AMERICA, THE AMERICAN PROPERTY CASUALTY INSURANCE ASSOCIATION, THE AMERICAN TORT REFORM ASSOCIATION, AND THE NATIONAL FEDERATION OF INDEPENDENT BUSINESS IN SUPPORT OF RESPONDENT in the above entitled case complies with the typeface requirements of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that this brief complies with the word limitation of Supreme Court Rule 33.1(g)(xii), containing 5,834 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

Date: October 6, 2021

Howard N. Slugh