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No. 20-220

VBS DISTRIBUTION, INC., a California corporation,  
also known as VBS HOME SHOPPING, and  
VBS TELEVISION, INC., a California corporation,  
Petitioners,

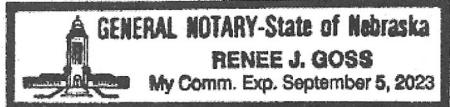
v.

NUTRIVITA LABORATORIES, INC.,  
a California corporation, et al.,  
Respondents.

#### **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the MOTION FOR LEAVE TO FILE AND BRIEF OF AMICUS CURIAE BY THE LAW OFFICE OF J. EDWARD NIEHAUS AND BRIEF OF AMICUS CURIAE 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 5529 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 23rd day of September, 2020.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
Notary Public

*Andrea H. Cockle*  
Affiant