



CERTIFICATE OF COMPLIANCE

No. 20-622

AMAZON.COM, INC., ET AL.,

Petitioners,

v.

BERNADEAN RITTMANN, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Civil Justice Association of California and the California Chamber of Commerce as Amici Curiae in Support of Petitioners contains 4,850 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 December 9, 2020.

Donna J. Wolf
Becker Gallagher Legal Publishing, Inc.
8790 Governor's Hill Drive, Suite 102
Cincinnati, OH 45249
(800) 890-5001

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

Date: December 9, 2020

John D. Gallagher
Notary Public

[seal]



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