No. 21-260

VIRGIN AMERICA, INC, et al.,

Petitioners,

v.

JULIA BERNSTEIN, et al.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, John D. Ohlendorf, a member of the Supreme Court Bar, certify that the BRIEF IN OPPOSITION

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 limi-

tation of Supreme Court Rule 33.1(g)(ii), containing 8,999 words, excluding the

parts that are exempted by Supreme Court Rule 33.1(d).

Date: September 21, 2021

John D. Ohlendorf