



CERTIFICATE OF COMPLIANCE

No. 21-296

AMN SERVICES, LLC,

Petitioner,

v.

VERNA CLARKE, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of National Association of Travel Healthcare Organizations as *Amicus Curiae* Supporting Petitioner in 21-296, *AMN Services, LLC v. Verna Clarke, et al.* contains 3,916 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 September 28, 2021.

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

Date: September 28, 2021

John D. Gallagher
Notary Public

[seal]



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