

CERTIFICATE OF COMPLIANCE

No. 22-192

GLENHAVEN HEALTHCARE LLC, A CALIFORNIA CORPORATION, ET AL.,

Petitioners,

v.

JACKIE SALDANA, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Chamber of Commerce of the United States of America, the American Hospital Association, the American Health Care Association, and the American Tort Reform Association as *Amici Curiae* in Support of the Petition contains 4,718 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 30, 2022.

Emily Mullins

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(800) 890-5001

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

Date: Sept 5 bn 30, 2022 Joh D Dulcher Notary Public

[seal]

JOHN D. GALLAGHER Notary Public, State of **Ohio** My Commission Expires February 14, 2923