

**CERTIFICATE OF COMPLIANCE**

No. 22-411

KEO RATHA, SEM KOSAL, SOPHEA BUN, YEM BAN, NOL NAKRY, PHAN SOPHEA, AND  
SOK SANG,  
*Petitioners,*

v.

PHATTHANA SEAFOOD CO., LTD. AND  
S.S. FROZEN FOOD CO., LTD.,  
*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the *Brief of Legal Scholars as Amici Curiae in Support of Petitioners* contains 4,114 words, excluding the parts of the document 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 November 30, 2022.

s/ Marco Simons

Marco Simons

*Counsel of Record*

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