

IN THE  
**Supreme Court of the United States**

---

ALICIA THOMPSON, PETITIONER

v.

JANELLE HENDERSON, RESPONDENT

---

*ON PETITION FOR WRIT OF CERTIORARI  
TO THE WASHINGTON SUPREME COURT*

---

**BRIEF OF THE CHAMBER OF COMMERCE  
OF THE UNITED STATES OF AMERICA  
AND THE AMERICAN TORT REFORM  
ASSOCIATION AS AMICI CURIAE  
IN SUPPORT OF PETITIONER**

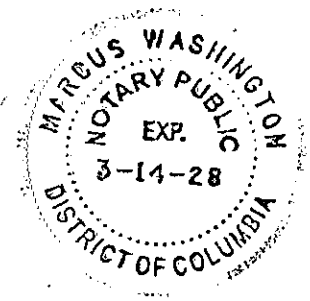
---

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,171 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.

Sworn to and subscribed before me this 31st day of March 2023.



A handwritten signature in black ink, appearing to be "MA", written over a horizontal line.

MARCUS WASHINGTON  
NOTARY PUBLIC  
District of Columbia

My commission expires March 14, 2028.