

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 23-29

CLA USA INC. AND CLA ESTATE SERVICES, INC.,

Petitioner,

v.

STATE OF WASHINGTON,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Carter G. Phillips, certify that the Reply Brief for the Petitioner in the foregoing case contains 2,999 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 December 4, 2023.

/s/ Carter G. Phillips
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