

**CERTIFICATE OF WORD COUNT AND
WORD LIMITATION COMPLIANCE**

The undersigned certifies, as per Supreme Court Rule 33.1(h), that the length of the accompanying Brief of *Amicus Curiae* David Boyle in Support of Petitioners in No. 16-1140, including the words on the last page, “January 15, 2018” and “Respectfully submitted”, but exclusive of “exempt” sections including the listing of counsel at the end, etc., is 3820 words, since his word-processing program states the word count is 3820 words. Thank you for your time.

January 15, 2018

Respectfully submitted,

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