CERTIFICATE OF COMPLIANCE

No. 16-1140

NATIONAL INSTITUTE OF FAMILY & LIFE ADVOCATES, D/B/A NIFLA, ET AL.,

Petitioners,

V.

XAVIER BECERRA, ATTORNEY GENERAL OF CALIFORNIA, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the *Amicus Curiae* Brief contains 8986 words, excluding the parts of the *Amicus Curiae* 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 February 26, 2018.

Thomas Bennigson

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