

## CERTIFICATE OF WORD COUNT

Case No. 17-108

Case Name:

*Arlene's Flowers v. State of Washington*  
*Arlene's Flowers v. Robert Ingersoll and Curt Freed*

Document Title:

Supplemental Brief for Respondents Robert Ingersoll and Curt Freed

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Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Supplemental Brief of Respondents Robert Ingersoll and Curt Freed, which was prepared using Century Schoolbook 12-point typeface, contains 1,632 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 7th day of June 2018.

/s/Elizabeth C. Grefrath  
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