



CERTIFICATE OF COMPLIANCE

No. 17-1299

FRANCHISE TAX BOARD OF CALIFORNIA,
Petitioner,

v.

GILBERT P. HYATT,
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Professors William Baude and Stephen E. Sachs as *Amici Curiae* in Support of Neither Party contains 8,925 words, excluding the parts of the 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 September 18, 2018.

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: September 18, 2018

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023