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November 7, 2018

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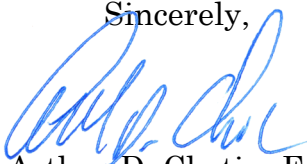
**RE: No. 17-1307: DENNIS OBDUSKEY V. MCCARTHY & HOLTHUS, LLP, ET AL.**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Michigan Creditors Bar Association in Support of Respondents referenced above contains **3,365** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Arthur D. Chotin, Esq.  
Principal