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January 29, 2018

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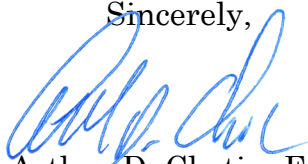
RE No. 17-333: O. JOHN BENISEK, ET AL. V. LINDA H. LAMONE, ET AL.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Judicial Watch, Inc. and Allied Educational Foundation in Support of Neither Party referenced above contains **2,755** 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

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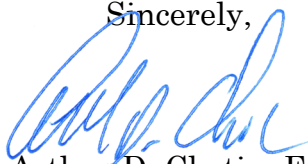
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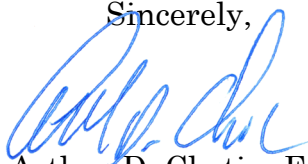
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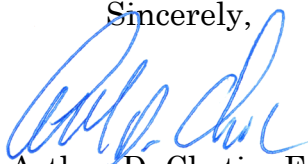
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