



**CERTIFICATE OF COMPLIANCE**

No. 17-432

CHINA AGRITECH, INC.,

*Petitioner,*

v.

MICHAEL H. RESH, *et al.*,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* American Association for Justice and National Consumer Law Center in Support of the Respondents contains 4,113 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 February 28, 2018.

Donna J. Wolf  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

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

Date: February 28, 2018

John D. Gallagher

Notary Public

[seal]



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