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May 7, 2018

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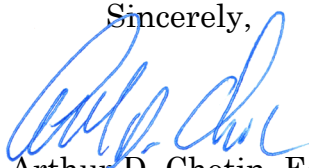
**RE 17-587: MOUNT LEMMON FIRE DISTRICT V. JOHN GUIDO AND DENNIS RANKIN**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Merits Brief for Petitioner referenced above contains **13,843** 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