

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 17-949

John Sturgeon,

*Petitioner,*

v.

Bert Frost, In His Official Capacity as Alaska Regional Director of the National  
Park Service, et al.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I, Carter G. Phillips, certify that the Brief of *Amici Curiae* Alaska Native Subsistence Users in Support of Respondents in the foregoing case contains 7,203 words, excluding the parts of the document 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.

/s/ Carter G. Phillips  
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