

CERTIFICATE OF COMPLIANCE

No. 17-961

THEODORE H. FRANK, *et al.*, *Petitioners*,
v.
PALOMA GAOS, *et al.*, *Respondents*.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Center for Constitutional Jurisprudence in support of Petitioner contains 3,256 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 7, 2018



John C. Eastman
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Center for Constitutional
Jurisprudence