



CERTIFICATE OF COMPLIANCE

No. 17-961

THEODORE H. FRANK, *et al.*,
Petitioners,

v.

PALOMA GAOS, ON BEHALF OF HERSELF AND ALL
OTHERS SIMILARLY SITUATED, *et al.*,
Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Attorneys General of Arizona, Alabama, Alaska, Arkansas, Colorado, Idaho, Indiana, Louisiana, Mississippi, Nevada, North Dakota, Oklahoma, Rhode Island, South Carolina, Texas, and Wyoming as *Amici Curiae* in Support of Petitioners contains 3,260 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.

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

Date: February 7, 2018
John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2018