

**17-961**

THEODORE H. FRANK and MELISSA ANN HOLYOAK,

*PETITIONERS,*

v.

PALOMA GAOS, on behalf of herself and  
all others similarly situated, et al.,

*RESPONDENTS.*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that Brief for the Cato Institute as *Amicus Curiae* in Support of Petitioners contains 8,213 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Jeremy L. Kidd  
*Counsel of Record*