



CERTIFICATE OF COMPLIANCE

No. 17-961

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

v.

PALOMA GAOS, Individually and on Behalf of All
Others Similarly Situated, *et al.*,
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* David Lowrey, Raymond J. Pepperell, Blake Morgan, and Guy Forsyth in Support of Petitioners contains 3,966 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 July 16, 2018.

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

Date: July 16, 2018

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023