



**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.*,  
*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Legal Aid Organizations as *Amici Curiae* in Support of Respondents in 17-961, *Theodore H. Frank, et al. v. Paloma Gaos, Individually and on Behalf of All Others Similarly Situated, et al.* contains 8,182 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 September 5, 2018.

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

Date: September 5, 2018

J.A. Kershner  
Notary Public

[seal]



JULIE ANNE KERSHNER  
Notary Public, State of Ohio  
My Commission Expires  
February 21, 2022