

CERTIFICATE OF COMPLIANCE

No. 17-961

IN THE
SUPREME COURT OF THE UNITED STATES

THEODORE H. FRANK and MELISSA ANN HOLYOAK,

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 for *amici curiae* contains 4,759 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.

s/Nikolina Gurfinkel

Nikolina Gurfinkel

Sworn to on this 5th day
of September, 2018