

**CERTIFICATE OF WORD COUNT AND WORD LIMITATION
COMPLIANCE**

The undersigned certifies, as per Supreme Court Rule 33.1(h), that the length of the accompanying Brief of *Amicus Curiae* David Boyle in Support of Respondents in 17-965, including the words on the first (and last) page, “March 29, 2018” and “Respectfully submitted”, but exclusive of “exempt” sections including the listing of counsel at the end, etc., is 144 words, since his word-processing program states the word count is 144 words. The undersigned also certifies, if needed, that the length of the accompanying Motion for Leave to File Brief as *Amicus Curiae*, preceding the Brief of *Amicus Curiae*, including the words on the last page, “March 30, 2018” and “Respectfully submitted”, but exclusive of “exempt” sections including the listing of counsel, and the asterisks, at the end, etc., is 729 words, since his word-processing program states the word count is 729 words. So, if needed to be mentioned, the grand total of words is 873 words (144 + 729), including both the Motion and the Brief. Thank you for your time.

March 30, 2018

Respectfully submitted,

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