



CERTIFICATE OF COMPLIANCE

No. 17-988

LAMPS PLUS, INC., *et al.*,

Petitioners,

v.

FRANK VARELA,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae American Association for Justice in Support of the Respondent contains 4,216 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 6, 2018.

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

Date: September 6 2018

J.A. Kershner
Notary Public

[seal]



JULIE ANNE KERSHNER
Notary Public, State of Ohio
My Commission Expires
February 21, 2023