



## CERTIFICATE OF COMPLIANCE

No. 18-1165

RETIREMENT PLANS COMMITTEE OF IBM, *et al.*,  
*Petitioners,*

v.

LARRY W. JANDER, *et al.*,  
*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amici Curiae American Association for Justice and Public Justice in Support of Respondents contains 4,164 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 October 1, 2019.

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

Date: October 17, 2019

J. A. Kershner

Notary Public

[seal]



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