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## LAIR v. MANGAN, No. 18-149

### CERTIFICATION OF COMPLIANCE WITH RULE 33.1

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of the Public Policy Legal Institute was written in Century font, 12-point (except for footnotes and other permitted matter), and contains exactly 5,282 words, including footnotes but excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d), as counted by the word count feature of Microsoft Word 2010, used to prepare the text. I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 22, 2018.



Barnaby W. Zall  
Counsel of Record for *Amicus Curiae*