



**CERTIFICATE OF COMPLIANCE**

No. 18-266

THE DUTRA GROUP,

*Petitioner,*

v.


CHRISTOPHER BATTERTON,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae The American Waterways Operators in Support of Petitioner contains 5,221 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 January 29, 2019.

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

Date: July 29, 2019

John D. Gallagher  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023