

# STRAUSS & STRAUSS A.P.C.

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November 20, 2018

Clerk  
Supreme Court of the United States  
One First Street NE  
Washington, DC 20002

Re: *No. 18-389, Parker Drilling v. Newton*

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition to Petition for Writ of Certiorari contains 8,894 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 20, 2018.

Sincerely,



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