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February 12, 2019

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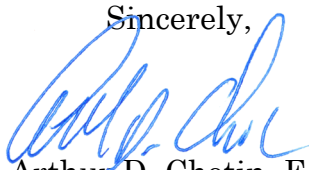
RE: NO. 18-422: ROBERT A. RUCHO, *ET AL.* V. COMMON CAUSE, *ET AL.*

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Judicial Watch, Inc. and Allied Educational Foundation in Support of Neither Party referenced above contains **2,468** words, excluding the parts of the document 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.

Sincerely,



Arthur D. Chotin, Esq.
Principal