



**CERTIFICATE OF COMPLIANCE**

No. 20-1573

VIKING RIVER CRUISES, INC.,

*Petitioner,*

v.

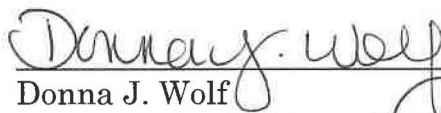
ANGIE MORIANA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of American Association for Justice as Amicus Curiae in Support of Respondent contains 4,770 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 March 9, 2022.

  
\_\_\_\_\_  
Donna J. Wolf  
Becker Gallagher Legal Publishing, Inc.  
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(800) 890-5001

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

Date: March 9, 2022

John W. Gallagher

Notary Public

[seal]



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