

IN THE

Supreme Court of the United States

JANE CUMMINGS, *Petitioner*,

v.

PREMIER REHAB KELLER, P.L.L.C., *Respondent*.

CERTIFICATE OF COMPLIANCE

I, Robert S. Peck, a member of the Bar of this Court, hereby certify, pursuant to Supreme Court Rule 33.1(h), that the brief of the American Association for Justice as *amicus curiae* in support of Petitioner in the above-captioned case contains 6,401 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

August 26, 2021

s/ ROBERT S. PECK

Robert S. Peck

Counsel of Record

CENTER FOR CONSTITUTIONAL LITIGATION, P.C.

2117 Leroy Place, N.W.

Washington, DC 20008

(202) 944-2874

robert.peck@cclfirm.com