

**No. 22-204**

MELISSA ELAINE KLEIN AND AARON

WAYNE KLEIN,

*Petitioners,*

*v.*

OREGON BUREAU OF LABOR AND

INDUSTRIES,

*Respondent,*

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Manhattan Institute as *Amicus Curiae* in Support of Petitioners contains 3,503 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro  
*Counsel of Record*