



CERTIFICATE OF COMPLIANCE

No. 22O152

STATE OF MONTANA AND STATE OF WYOMING,

*Plaintiffs,*

v.

STATE OF WASHINGTON,

*Defendant.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Kentucky, Alaska, Arkansas, Indiana, Kansas, Mississippi, Missouri, Nebraska, North Dakota, Ohio, Oklahoma, South Carolina, South Dakota, Tennessee, Texas, Utah, and West Virginia as *Amici Curiae* Supporting Plaintiffs contains 3,329 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 24, 2020.

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

Date: March 24, 2020

John D. Gallagher  
Notary Public

[seal]



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