



CERTIFICATE OF COMPLIANCE

No. 23-424

AMAZON.COM, INC., ET AL.,

Petitioners,

v.

JENNIFER MILLER, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Civil Justice Association of California as *Amicus Curiae* Supporting Petitioner contains 2,425 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio
County of Hamilton

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 22, 2023.

Donna J. Moore

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

Date: November 22, 2023

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2028