No. _____

IN THE

Supreme Court of the United States

BERNSTEIN, SHUR, SAWYER & NELSON, P.A., ET AL. *Petitioners*,

v.

SUSAN R. SNOW,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 6,087 words, excluding the parts of the document 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 12, 2018.

Matthew S. Hellman