

No. 17-647
Rose Mary Knick, Petitioner,

v.

Township of Scott, PA; Carl S. Ferraro, Individually and in his Official Capacity as Scott
Township Code Enforcement Officer, Respondents.

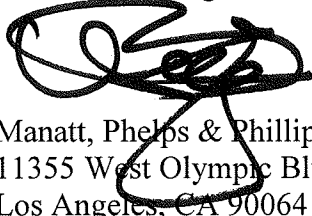
CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Amicus Curiae Brief for Institute
For Justice, Owners Counsel of America, and Professor Daniel Mandelker Supporting Petitioner
contains 5,052 words, including footnotes, but 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 May 30, 2018 at Los Angeles California.

Michael M. Berger

A handwritten signature in black ink, appearing to read 'Michael M. Berger', written over a circular stamp or seal.

Manatt, Phelps & Phillips, LLP
11355 West Olympic Blvd.
Los Angeles, CA 90064