

CERTIFICATE OF COMPLIANCE

No. 17-7046

IN THE SUPREME COURT OF THE UNITED STATES

ERIC JERMAINE SPIVEY,
CHENEQUA AUSTIN,
Petitioners,

v.

UNITED STATES OF AMERICA,
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Amicus Curiae Brief of Pacific Legal Foundation contains 4,604 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 February 1, 2018.



MARK MILLER
Counsel of Record
Pacific Legal Foundation
8645 N. Military Trail, Suite 511
Palm Beach Gardens, FL 33410
Telephone: (561) 691-5000
Facsimile: (561) 691-5006
Email: mm@pacificlegal.org

*Counsel for Amicus Curiae
Pacific Legal Foundation*