

## CERTIFICATE OF COMPLIANCE

Pursuant to Arizona Rule of Civil Appellate Procedure 14(b), the undersigned hereby certifies that the foregoing Answering Brief appears in proportionately spaced type of 14 points, is double spaced using a Roman font, except for footnotes, extended quotes and topic headings, which are single spaced. The Answering Brief contains 4,655 words, excluding the table of contents, table of citations and certificates.

**Dated:** January 16, 2018

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Patrick J. Whelan