
for its reply brief. The parties can fully and fairly present their arguments with an extra 15,000 words, far fewer than the 35,000 words that an additional set of briefing would entail.

Dated: June 12, 2018

Respectfully submitted,

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I certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the paper original and that I possess a paper original of the signed document that is available for review by the parties and the adjudicator.

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