In the Supreme Court of the United States

DEUTSCHE BANK TRUST COMPANY AMERICAS, ET AL.,

Petitioners,

V

ROBERT R. McCormick Foundation, et al.,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Daniel N. Lerman, a member of the Bar of this Court, certify that the Supplemental Brief for Petitioners in the above-captioned case contains 1,629 words, in accordance with S. Ct. R. 33.

Daniel N. Lerman

Dated: January 8, 2018