## IN THE

## Supreme Court of the United States

QUALITY SYSTEMS, INC.; STEVEN T. PLOCHOCKI; PAUL A. HOLT; SHELDON RAZIN,

Petitioners,

v.

CITY OF MIAMI FIRE FIGHTERS' AND POLICE OFFICERS' RETIREMENT TRUST; ARKANSAS TEACHER RETIREMENT SYSTEM,

Respondents.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the Securities Industry and Financial Markets Association and the Chamber of Commerce of the United States of America as *Amici Curiae* Supporting Petitioners contains 4,262 words, excluding the parts of the brief that are exempted by this Court's Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 22, 2018

Erin Gallagher

Sworn before me on March 22, 2018

Notary Public

Noreen Mary Verini
Notary Public, State of New York
No. 01 VE6367721
Qualified in Westchester County
Certificate on File in New York County
Commission Expires November 27th,

