IN THE

Supreme Court of the United States

 $\begin{array}{c} \text{Helsinn Healthcare S.A.,} \\ Petitioner, \\ \text{v.} \end{array}$

TEVA PHARMACEUTICALS USA, INC., AND TEVA PHARMACEUTICAL INDUSTRIES, LTD., Respondents.

CERTIFICATE OF COMPLIANCE WITH WORD COUNT LIMITATIONS UNDER RULE 33.1(h)

As required by Supreme Court Rule 33.1(h), I declare that the Brief for *Amicus Curiae* American Intellectual Property Law Association in Case No. 17-1229 contains 8,121 words, excluding 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 the 30th day of August, 2018.

Respectfully submitted,

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