No. 17-2

In the Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v.

MICROSOFT CORPORATION,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Andrew J. Pincus, counsel for *amici curiae* and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Brief of 12 Business and Consumer Associations as *Amici Curiae* in Support of Respondent contains 8,820 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

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Andrew J. Pincus