IN THE

Supreme Court of the United States



UNITED STATES OF AMERICA,

Petitioner,

v.

MICROSOFT CORPORATION,

Respondent.

On Writ of Certiorari to the United States Court of Appeals for the Second Circuit

CERTIFICATE OF COMPLIANCE

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January 18, 2018

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Counsel for Amicus Curiae the European Company Lawyers Association As required by this Court's Rule 33.1(h), I certify that the Brief for the European Company Lawyers Association as *Amicus Curiae* in Support of Respondent contains 7587 words, excluding the parts of the brief that are exempted by this Court's Rule 33.1(d).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 18, 2018

New York, New York

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