In the Supreme Court of the United States

SOUTH DAKOTA,

Petitioner,

WAYFAIR, INC., OVERSTOCK.COM, INC.,
AND NEWEGG, INC.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the **Brief of the National Association of Certified Service Providers and the Software & Information Industry Association as Amici Curiae in Support of Neither Party** contains 6,422 words, excluding the 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 March 1, 2018

Ruthanne M. Deutsch

Deutsch Hunt PLLC

300 New Jersey Ave. NW Suite 900

Washington, DC 20001

202-868-6915

rdeutsch@deutschhunt.com

Counsel for National Association of Certified Service Providers and Software & Information Industry Association