In the Supreme Court of the United States

SOUTH DAKOTA,

Petitioner,

V.

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

Respondents.

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 *Amici Curiae* eBay Inc., et al., in Support of Respondents contains 8,990 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Sincerely,

Andrew J. Pincus