CERTIFICATE OF COMPLIANCE

No. 18-1165

RETIREMENT PLANS COMMITTEE OF IBM, et al., Petitioners,

v.

LARRY W. JANDER, et al., Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* DRI—The Voice of the Defense Bar in Support of Petitioners contains 4,581 words, excluding the parts of the brief 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 August 13, 2019.

Scott Burnett Smith