In the Supreme Court of the United States

INVESTPIC, LLC,

Petitioner,

v.

SAP AMERICA, INC.,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Brief of *Amica Curiae* Anne E. Barschall in Support of Petitioner in case No. 18-1199 contains 2,941 words, excluding 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 the 15th day of April, 2019.

Respectfully submitted,

/s/ Anne E. Barschall

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