Nos. 18-1447, 19-351 In the Supreme Court of the United States

Republic of Hungary, et al., Petitioners,

V.

ROSALIE SIMON, ET AL., Respondents.

FEDERAL REPUBLIC OF GERMANY, ET AL., Petitioners,

V.

ALAN PHILIPP, GERALD STIEBEL, AND JED LIEBER, Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Amicus Curiae Brief of The 1939 Society, Michael Bazyler, Bet Tzedek, Center for the Study of Law & Genocide, and The Holocaust Education Center in the Desert, Inc. In Support of Respondents, contains 7,737 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 October 28, 2020, in Los Angeles, California.

Benjamin G. Shatz

Manatt, Phelps & Phillips, LLP 2049 Century Park East, Suite 1700 Los Angeles, CA 90067 bshatz@manatt.com

(310) 312-4383