IN THE SUPREME COURT OF THE UNITED STATES

Nos. 18-1447 & 19-351

REPUBLIC OF HUNGARY, ET AL.,

Petitioners,

v.

ROSALIE SIMON, ET AL.,

Respondents.

FEDERAL REPUBLIC OF GERMANY, ET AL., Petitioners,

v.

ALAN PHILIPP, ET AL.,

Respondents.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of Professors William S. Dodge and Maggie Gardner as *Amici Curiae* in Support of Respondents, which was prepared using Century Schoolbook 12-point typeface, contains 7,943 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 2013) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 29, 2020.

> Geoffrey M. Klineberg Counsel of Record for Amici Professors William S. Dodge and Maggie Gardner