SUPREME COURT OF THE UNITED STATES No. 18-1451 & 18-1477 -----X NATIONAL REVIEW, INC., Petitioner, v. MICHAEL E. MANN, Respondent. COMPETITIVE ENTERPRISE INSTITUTE, ET AL., Petitioners, v. MICHAEL E. MANN, Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3,633 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 this 2nd day of July, 2019.

Candice Best

Sworn to and subscribed before me this 2^{nd} day of July, 2019.

Elias Melendez

Notary Public State of New York

No. 24-4799661

Qualified in Kings County

Commission Expires Aug. 31, 2021

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