18-1501

IN THE Supreme Court of the United States

CHARLES C. LIU, ET AL., Petitioners,

v. SECURITIES AND EXCHANGE COMMISSION, *Respondent*.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the *Brief of Securities Law Professors as Amici Curiae in Support of Respondent*, which was prepared using Century Schoolbook 12-point typeface, contains <u>7,859</u> 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 Word 2016) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 20, 2020.

Donna M. Nagy

Donna M. Nagy Indiana University Maurer School of Law Counsel of Record