## IN THE SUPREME COURT OF THE UNITED STATES

No. 18-1501

CHARLES C. LIU AND XIN WANG A/K/A LISA WANG,

Petitioners,

v.

SECURITIES AND EXCHANGE COMMISSION, Respondent.

## CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply Brief for Petitioners, which was prepared using Century Schoolbook 12-point typeface, contains 5,999 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 February 14, 2020.

Michael K. Kellogg

Counsel of Record for Petitioners