

No. 18-189

IN THE  
**Supreme Court of the United States**

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SMARTFLASH LLC,

*Petitioner,*

v.

SAMSUNG ELECTRONICS AMERICA, INC.,  
SAMSUNG ELECTRONICS CO., LTD., APPLE INC., GOOGLE  
LLC, AND ANDREI IANCU, UNDER SECRETARY OF  
COMMERCE FOR INTELLECTUAL PROPERTY AND  
DIRECTOR OF THE UNITED STATES PATENT AND  
TRADEMARK OFFICE,

*Respondents.*

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CERTIFICATE OF COMPLIANCE

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I hereby certify that I am a member in good standing of the bar of this Court and that the Brief in Opposition contains 2,787 words and complies with the word limitation established by Rule 33.1(g)(ii) of the Rules of this Court.

Dated: August 22, 2018

/s/Jeremy M. Christiansen  
Jeremy M. Christiansen