

IN THE SUPREME COURT OF THE UNITED STATES

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No. 18-189

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 WORD COUNT**

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Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply Brief for Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 1,059 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 September 5, 2018.



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Aaron M. Panner  
*Counsel of Record for Petitioner*