No. 18-302 IN THE SUPREME COURT OF THE UNITED STATES

ANDREI IANCU, UNDER SECRETARY OF COMMERCE FOR INTELLECTUAL PROPERTY AND DIRECTOR, UNITED STATES PATENT AND TRADEMARK OFFICE, PETITIONER v.

ERIK BRUNETTI

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF AMICUS CURIAE KURT M. ANDERSON IN SUPPORT OF PETITIONER'S REQUEST FOR REVERSAL contains 2,207 words, excluding 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 February 18, 2019.

/s/ Kurt M. Anderson