## 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, Respondent.

On Writ of Certiorari to the United States Court of Appeals For the Federal Circuit

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Simon Tam in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that the Brief of Amicus Curiae contains 3,037 words, excluding the 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 March 20, 2019.

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