IN THE SUPREME COURT OF THE UNITED STATES

No. 18-728

JACOBUS RENTMEESTER,

Petitioner,

v.

NIKE, INC.,

Respondent.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of Professor Terry S. Kogan as *Amicus Curiae* in Support of Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 5,267 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 January 7, 2019.

Aaron M. Panner

Au Ma Ca

Counsel of Record for Amicus

Professor Terry S. Kogan