No. 18-926

IN THE Supreme Court of the United States

PUTNAM INVESTMENTS, LLC, ET AL.,

Petitioners,

v.

JOHN BROTHERSTON, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for Amici Curiae Chamber of Commerce for the United States of America et al., in Support of Petitioners in Putnam Investments, LLC v. Brotherston, No. 18-926, complies with the word limitations, as it contains 6,000 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 15, 2019

Shay Dvoretzky