

In the Supreme Court of the United States

PUTNAM INVESTMENTS, LLC, *et al.*,

Petitioners,

v.

JOHN BROTHERSTON, *et al.*,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Nicole A. Saharsky, counsel for the American Council of Life Insurers and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Brief of the American Council of Life Insurers as *Amicus Curiae* Supporting Petitioners contains 5,529 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Sincerely,



Nicole A. Saharsky