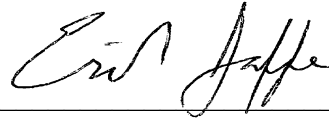


CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying BRIEF OF THE HUDSON INSTITUTE AS AMICUS CURIAE IN SUPPORT OF RESPONDENT in Google LLC v. Oracle America, Inc., No. 18-956, complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 2,855 words, based on the word-count function of Microsoft Word (Office 365), including footnotes and excluding material not required to be counted by Rule 33(d).

A handwritten signature in black ink, appearing to read "Erik S. Jaffe", is written above a horizontal line.

Erik S. Jaffe