In The Supreme Court of the United States

ALTERA CORPORATION & SUBSIDIARIES,

Petitioners,

v.

COMMISSIONER OF INTERNAL REVENUE,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

BRIEF FOR PRICEWATERHOUSECOOPERS LLP, DELOITTE TAX LLP, AND KPMG LLP AS AMICI CURIAE IN SUPPORT OF PETITIONERS

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief for PricewaterhouseCoopers LLP, Deloitte Tax LLP, and KPMG LLP as Amici Curiae in Support of Petitioners in the above-referenced case contains 4,643 words, excluding the portions 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 16, 2020.

 $\mathbf{B}\mathbf{y}_{oldsymbol{-}}$

Melissa Arbus Sherry

LATHAM & WATKINS LLP

555 11th Street, NW

Suite 1000

Washington, DC 20004

(202) 637-2200

melissa.sherry@lw.com

Counsel for Amici Curiae

PricewaterhouseCoopers LLP,

Deloitte Tax LLP, and KPMG LLP