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June 2, 2020

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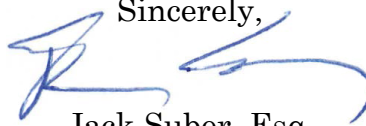
**RE NO. 19-1269: TCL COMMUNICATION TECHNOLOGY HOLDINGS LIMITED, ET AL.  
V. TELEFONAKTIEBOLAGET LM ERICSSON, ET AL.**

Dear Sir or Madam:

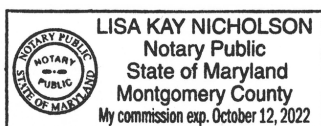
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* ACT | The App Association referenced above contains **5,957** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,



Jack Suber, Esq.  
Principal



Sworn and subscribed before me this 2nd day of June 2020.

