CERTIFICATE OF COMPLIANCE

No. 19-1269

TCL COMMUNICATION TECHNOLOGY HOLDINGS LIMITED, ET AL.,

Petitioners,

v.

TELEFONAKTIEBOLAGET LM ERICSSON, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Amicus Curiae Brief of Fair Standards Alliance in support of Petitioners in the above captioned case contains **4,685** words, excluding the parts of the Brief 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 June $5,\,2020.$

Ruthanne M. Deutsch

Ruthanne H. Deutsch