IN THE Supreme Court of the United States

MALWAREBYTES, INC., Petitioner, V.

ENIGMA SOFTWARE GROUP USA, LLC, *Respondent*.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Ian Simmons, a member of the bar of this Court, certify on this 12th day of June 2020, that the Brief of TechFreedom as *Amicus Curiae* in Support of Petitioner in the above-captioned case contains 4,708 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

<u>/s/ Ian Simmons</u> Ian Simmons