No. 19-1401

In the Supreme Court of the United States

APRIL HUGHES, ET AL.,

Petitioners,

v.

NORTHWESTERN UNIVERSITY, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Nicole A. Saharsky, hereby certify that, according to the word-count tool in Microsoft Word, the Brief for *Amici Curiae* American Council on Education and 17 Other Higher Education Organizations in Support of Petitioners consists of 7,726 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The Brief therefore complies with Rule 33.1(g).

Dated: October 28, 2021

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