## IN THE

## Supreme Court of the United States

APRIL HUGHES, ET AL.,

Petitioners,

v.

NORTHWESTERN UNIVERSITY, ET AL.,

Respondents.

On Writ of Certiorari to the United States Court of Appeals for the Seventh Circuit

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Jaime A. Santos, counsel of record and a member of the Bar of this Court, certify that the Brief for the Chamber of Commerce of the United States of America, American Council of Life Insurers, American Property Casualty Insurance Association, Business Roundtable, ERISA Industry Committee, Professional Liability Underwriting Society, and Securities Industry and Financial Markets Association as *Amici Curiae* Supporting Respondents contains 7,986 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

October 28, 2021

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