Nos. 19-1434, 19-1452, 19-1458

In The Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v.

ARTHREX, INC., ET AL.,

Respondents.

SMITH & NEPHEW, INC., ET AL.,

Petitioners,

v.

ARTHREX, INC., ET AL.,

Respondents.

ARTHREX, INC.,

Petitioner,

v.

SMITH & NEPHEW, INC., ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Opening Brief for Smith & Nephew, Inc. and ArthroCare Corp. contains 12,910 words and complies with the word limitation established by this Court's order of October 21, 2020.

Dated: November 25, 2020

Kellam M. Conover