IN THE

Supreme Court of the United States

UNITED STATES OF AMERICA,

PETITIONER,

v.

ARTHREX, INC, ET AL,

RESPONDENTS.

CERTIFCIATE OF COMPLIANCE

I, Alan B. Morrison, counsel of record for the amicus curiae Administrative, Constitutional, and Intellectual Property Law Professors, in support of petitioners in Nos. 19-1434 and 19-1452, do hereby certify, pursuant to Rule 33.1(h) of this Court, that this brief contains 7973 words, including footnotes, excluding the portions set forth in Rule 33.1(d).

/s/ Alan B. Morrison

November 30, 2020