Nos. 19-1434, 19-1452, and 19-1458 IN THE

Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v.

 $\begin{array}{c} \text{ARTHREX, Inc. and Polaris Innovations Limited,} \\ Respondent. \end{array}$

SMITH & NEPHEW, INC. AND ARTHROCARE CORP., Petitioner,

v.

ARTHREX, INC. AND UNITED STATES OF AMERICA, Respondent.

ARTHREX, INC.,

Petitioner,

v.

SMITH & NEPHEW, INC.; ARTHROCARE CORP.; AND UNITED STATES OF AMERICA, Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3,898 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 2, 2020.

/s/ Matthew S. Hellman
Matthew S. Hellman