## In the Supreme Court of the United States

No. 19-1434 United States of America, Petitioner, v. Arthrex, Inc., et al., Respondents. No. 19-1452 Smith & Nephew, Inc., et al., Petitioners, v. Arthrex, Inc., et al., Respondents. No. 19-1458 Arthrex, Inc., Petitioner, v. Smith & Nephew, Inc., et al.,

Respondents.

## CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Brief *Amicus Curiae* of TiVo Corporation in Support of Respondent Arthrex filed on behalf of *Amicus Curiae* TiVo Corporation contains 5,953 words, excluding 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 the 29th day of December 2020.

\_\_/s/ *Michael E. Joffre*\_

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