CERTIFICATE OF COMPLIANCE

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.

As required by Supreme Court Rule 33.1(h), I, Jeremy Cooper Doerre, Counsel of Record for Amicus Curiae Jeremy C. Doerre, and a member of the Bar of this Court, do hereby certify that the Brief of Amicus Curiae Jeremy C. Doerre Supporting Petitioner in No. 19-1458 contains 7,794 words, excluding the parts of the document exempted by Supreme Court Rule 33.1(d), and complies with the word limitations set out in Rule 33.1(g).

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

Executed on December 30, 2020

Jeremy Cooper Doerre Tillman Wright, PLLC 3440 Toringdon Way, Ste. 310 Charlotte, NC 28277 jdoerre@ti-law.com (704) 248-4883