Nos. 19-351, 19-520

FEDERAL REPUBLIC OF GERMANY,
A FOREIGN STATE, AND STIFTUNG
PREUSSISCHER KULTURBESITZ,
AN INSTRUMENTALITY OF A FOREIGN STATE,
Petitioners and Conditional Cross-Respondents,

ALAN PHILIPP, GERALD STIEBEL, and JED LEIBER, Respondents and Conditional Cross-Petitioners.

CERTIFICATE OF COMPLIANCE

I, Nicholas M. O'Donnell hereby certify that I am a member in good standing of the bar of this Court and that, as required by this Court's Miscellaneous Order of April 15, 2020 and by Supreme Court Rule 33.2, the SUPPLEMENTAL BRIEF OF RESPONDENTS AND CONDITIONAL CROSS-PETITIONERS in the above-entitled case complies with the page limit requirement of Supreme Court Rule 33.2, being fewer than thirteen (13) pages long, excluding portions thereof exempt from the page limit.

June 8, 2020

Nicholas M. O'Donnell