IN THE SUPREME COURT OF THE UNITED STATES

FACEBOOK, INC., Petitioner,

v.

NOAH DUGUID, ET AL., Respondent.

ON WRIT OF CERTIORARI TO THE THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for Dr. Henning Schulzrinne, in Support of Respondent Noah Duguid in Facebook, Inc. v. Duguid, No. 19-511, complies with the word limitations, as it contains 2,932 words. I declare under penalty of perjury that the foregoing is true and correct.

s/ Kris Skaar

KRIS SKAAR
Counsel of Record
SKAAR & FEAGLE, LLP
133 Mirramont Lake Drive
Woodstock, GA 30189
(770) 427-5600
kskaar@skaarandfeagle.com
Counsel for Amicus Curiae
Henning Schulzrinne

October 23, 2020