No. 20-1008

In The Supreme Court of the United States

STATE FARM LIFE INSURANCE COMPANY,

Petitioner,

v.

MICHAEL G. VOGT,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Supplemental Brief for Petitioner contains 1,325 words and complies with the word limitation established by Rule 33.1(g)(iv) of the Rules of this Court.

Dated: April 9, 2021

Theodore J. Boutrous