IN THE SUPREME COURT OF THE UNITED STATES

No. 20-1077

AMAZON.COM, INC., and AMAZON LOGISTICS, INC.,

Petitioners,

v.

BERNARD WAITHAKA,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Cory L. Andrews, counsel for *amici curiae* and a member of the Bar of this Court, certify under Rules 33.1(g) and (h) that the brief contains 4,823 words, excluding those parts of the brief exempted by Rule 33.1(d).

Cory L. Andrews

WASHINGTON LEGAL FOUNDATION 2009 Massachusetts Ave., NW

Washington, DC 20036

(202) 588-0302

candrews@wlf.org

Counsel for Amici Curiae

Dated: May 7, 2021