## Nos. 20-1199 & 21-707

## In The Supreme Court of the United States

STUDENTS FOR FAIR ADMISSIONS, INC., Petitioner,

v.

President & Fellows of Harvard College, Respondent.

STUDENTS FOR FAIR ADMISSIONS, INC., Petitioner,

v.

University of North Carolina, et al., Respondents.

## CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that, pursuant to Rule 33.1(h) of the Rules of this Court, the Brief of the American Federation of Teachers as *Amicus Curiae* in Support of Respondents complies with the type-volume limitations of Rule 33.1(g). Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 4,709 words. (The undersigned is relying on the word-count utility in Microsoft Word 2016, the word-processing system used to prepare the brief, consistent with Rule 33.1(d).)

Kevin K. Russell August 1, 2022