CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Brief of National Women's Health Network as *Amicus Curiae* in Support of Respondents in Johnson & Johnson v. Ingham, No. 20-1223 complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 5,665 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).

En Jaffe

Erik S. Jaffe