

No. 20-1364

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**In the Supreme Court of the United States**

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BOFI HOLDING, INC., ET AL.,

*Petitioners,*

v.

HOUSTON MUNICIPAL EMPLOYEES PENSION SYSTEM,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

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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 in Opposition 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 8,665 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).)



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Eric F. Citron  
June 25, 2021