

No. 20-1499

AMERICAN CIVIL LIBERTIES UNION,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Microsoft Corporation in Support of Petitioner contains 4,419 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Robert M. Loeb
Counsel of Record