

CERTIFICATE OF COMPLIANCE

No. 20-1566

DAVID CASSIRER, ET AL.,

Petitioners,

v.

THYSSEN-BORNEMISZA COLLECTION FOUNDATION,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the AMICUS BRIEF of The 1939 Society, American Jewish Committee, Bet Tzedek, Center for the Study of Law & Genocide at LMU Loyola Law School, and The Holocaust Education Center in the Desert contains **3,629** words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 18, 2021.

s/Benjamin G. Shatz
Counsel of Record for *Amici*
