No. 20-1599

In the Supreme Court of the United States

JOHN DOE 7, JANE DOE 7, JUANA DOE 11, MINOR DOE 11A, SEVEN SURVIVING CHILDREN OF JOSE LOPEZ 339, AND JUANA PEREZ 43A,

Petitioners,

v.

CHIQUITA BRANDS INTERNATIONAL, INC.,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Ariel N. Lavinbuk, a member of the Bar of this Court, hereby certify that the Brief of Civil Procedure Professors as Amici Curiae in the above-captioned case contains 4,198 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.

/s/ Ariel N. Lavinbuk

Dated: July 8, 2021 Ariel N. Lavinbuk

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