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September 24, 2020

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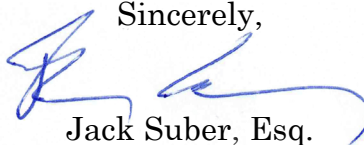
**RE NO. 20-222: GOLDMAN SACHS GROUP, INC., ET AL. V. ARKANSAS TEACHER
RETIREMENT SYSTEM, ET AL.**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Financial Economists referenced above contains **3,278** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 24th day of September 2020.

