No. 20-222

In The Supreme Court of the United States

GOLDMAN SACHS GROUP, INC., ET AL., Petitioners,

v.

ARKANSAS TEACHER RETIREMENT SYSTEM, ET AL., Respondents.

CERTIFICATE OF COMPLIANCE

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 7,986 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).)

Kevin K. Russell October 21, 2020