In the Supreme Court of the United States

Comcast Cable Communications, LLC,

Petitioner,

v.

Rovi Guides, Inc. and United States of America,

Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Memorandum in Response for Respondent Rovi Guides, Inc. contains 2,653 words, excluding 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.

Executed on the 21st day of September 2020.

<u>/s/ Michael E. Joffre</u> Michael E. Joffre Sterne Kessler Goldstein & Fox, PLLC 1100 New York Avenue, NW Washington, DC 20005 202.371.2600

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