



CERTIFICATE OF COMPLIANCE

No. 20-297

TRANS UNION LLC,

*Petitioner,*

v.

SERGIO L. RAMIREZ,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Electronic Frontier Foundation in Support of Respondent contains 5,816 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 March 10, 2021.

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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: March 10, 2021

John D. Gallagher

Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023