

In the Supreme Court of the United States

United States of America,

Petitioner,

v.

Image Processing Technologies LLC, et al.,

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 2,616 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 26th day of August 2020.

/s/ Michael E. Joffre

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