

No. 20-7650

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**In The**  
**Supreme Court of the United States**  
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*Bo Zou,*  
*Petitioner,*

v.

**LINDE ENGINEERING NORTH AMERICA, INC.,**  
*Respondent.*

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On Petition for Writ of Prohibition to the  
United States Court of Appeals for the Tenth Circuit

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**CERTIFICATE OF COMPLIANCE**  
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Certificate of Compliance

I hereby certify that the accompanying Brief in Opposition to Petitioner's Petition for Writ of Prohibition in *Bo Zo v. Linde Engineering North America, Inc.*, No. 20-7650 complies with the word count limitations of Supreme Court Rule 33(1)(g) in that it contains 1,669 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(1)(d).

/s/Jessica L. Craft  
Jessica L. Craft