IN THE Supreme Court of the United States

GS CLEANTECH CORPORATION, ET AL.,

Petitioner,

v.

ADKINS ENERGY, LLC, ET AL., Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the MOTION FOR LEAVE TO FILE AND BRIEF OF AMICUS CURIAE MICHAEL E. McCABE, JR., filed on January 4, 2021 in case no. 20-769, contains 4,906 words.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 14th day of January, 2021.

MICHAEL E. MCCABE, JR.

 $Counsel\ of\ Record$

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