No. 20-8

In the Supreme Court of the United States

DEUTSCHE BANK TRUST COMPANY AMERICAS, ET AL.,

Petitioners,

v. Robert R. McCormick Foundation, et al.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Joshua S. Bolian, a member of the Bar of this Court, hereby certify that the Reply Brief for Petitioners in the above-captioned case contains 2,997 words, excluding the parts of the Reply Brief for Petitioners that are exempted by Supreme Court Rule 33.1(d).

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

Joshua S. Bolian

Dated: September 8, 2020