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 Supplemental Brief For Petitioners In Response To Brief For The United States As Amicus Curiae in the above-captioned case contains 2,944 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.

Joshua S. Bolian

Dated: March 31, 2021