RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 20-807

BRADLEY LEDURE,

Petitioner,

v.

UNION PACIFIC RAILROAD COMPANY,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Carter G. Phillips, certify that the Brief of *Amicus Curiae* Chamber of Commerce of the United States of America in Support of Respondent in the foregoing case contains 4,787 words, excluding the 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 March 9, 2022.

/s/ Carter G. Phillips CARTER G. PHILLIPS SIDLEY AUSTIN LLP 1501 K Street, N.W. Washington, D.C. 20005 (202) 736-8000