## **CERTIFICATE OF COMPLIANCE**

No. 20-891

In the Supreme Court of the United States

AMERICAN AXLE & MANUFACTURING, INC., Petitioner, U. NEAPCO HOLDINGS LLC AND NEAPCO DRIVELINES LLC., Respondents.

As required by Supreme Court Rule 33.1(h), I, Jeremy Cooper Doerre, Counsel of Record for Amicus Curiae Jeremy C. Doerre, and a member of the Bar of this Court, do hereby certify that the Brief of Jeremy C. Doerre as Amicus Curiae in Support of Petitioner contains 5,965 words, excluding the parts of the document exempted by Supreme Court Rule 33.1(d), and complies with the word limitations set out in Rule 33.1(g).

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

Executed on March 1, 2021

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