No. 20-891

IN THE

Supreme Court of the United States

AMERICAN AXLE & MANUFACTURING, INC.,

Petitioner,

v.

NEAPCO HOLDINGS LLC AND NEAPCO DRIVELINES LLC,

Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that, pursuant to Rule 33.1(h) of the Rules of this Court, the Brief in Opposition complies with the type-volume limitations of Rule 33.1(g). Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 8,994 words. (The undersigned is relying on the word-count utility in Microsoft Word 2016, the word-processing system used to prepare the brief, consistent with Rule 33.1(d).)

March 31, 2021

J. Michael Huget HONIGMAN LLP 315 E. Eisenhower Parkway Suite 100 Ann Arbor, MI 48108 (734) 418-4200 mhuget@honigman.com

Counsel for Respondents