

**In the Supreme Court of the United States**

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VOLKSWAGEN GROUP OF AMERICA, INC., ET AL.,  
PETITIONERS

*v.*

THE ENVIRONMENTAL PROTECTION COMMISSION OF  
HILLSBOROUGH COUNTY, FLORIDA, AND SALT LAKE  
COUNTY, UTAH, RESPONDENTS.

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*ON PETITION FOR A WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT*

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**CERTIFICATE OF COMPLIANCE**

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As required by U.S. Supreme Court Rule 33.1(h), I, counsel for petitioners and a member of the Bar of this Court, certify that the Supplemental Brief for Petitioners contains 2,965 words, excluding the parts of the document that are exempted by U.S. Supreme Court Rule 33.1(d).

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

Executed on October 11, 2021.

*/s/ Robert J. Giuffra, Jr.*

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Robert J. Giuffra, Jr.  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, NY 10004  
(212) 558-4000  
giuffrar@sullcrom.com