

IN THE SUPREME COURT OF THE UNITED STATES

No. 21-1239

SECURITIES AND EXCHANGE COMMISSION, ET AL., PETITIONERS

v.

MICHELLE COCHRAN, RESPONDENT

CERTIFICATE OF WORD COUNT

I, Sarah M. Harris, counsel for amicus curiae Chamber of Commerce of the United States of America and a member of the Bar of this Court, certify that the amicus brief for the Chamber of Commerce of the United States of America in Support of Respondent in the above-captioned case contains 5,985 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Sarah M. Harris

Sarah M. Harris

July 7, 2022