SECURITIES AND EXCHANGE COMMISSION, ET AL., Petitioners,

> v. Michelle Cochran,

> > Respondent.

CERTIFICATE OF WORD COUNT

I hereby certify on this 8^{th} day of September, 2022 that the above referenced REPLY BRIEF FOR RESPONDENT, as indicated by the word count feature of MS Word, and including footnotes but excluding those parts enumerated for exclusion under the rules, contains 5,904 words.

/s/ Gregory G. Garre

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