No. 21-1333

IN THE Supreme Court of the United States

REYNALDO GONZALEZ, ET AL., Petitioners,

v.

GOOGLE LLC,

Respondent.

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 of Free Press Action as *Amicus Curiae* in Support of Neither Party 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 6,114 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).)

Kevin K. Russell December 7, 2022