

In the Supreme Court of the United States

VIRGIN AMERICA, INC., AND ALASKA AIRLINES, INC.,

Petitioners,

v.

JULIA BERNSTEIN, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Supplemental Brief for Petitioners in *Virgin America, Inc., et al. v. Julia Bernstein, et al.*, S. Ct. No. 21-260, complies with the word limitations, because it contains 912 words, excluding the parts of the document exempted by Rule 33.1(d).

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

Dated: June 22, 2022



Shay Dvoretzky