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March 3, 2022

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE NO. 21-441: ALFRED H. SIEGEL, TRUSTEE OF THE CIRCUIT CITY STORES, INC. LIQUIDATING TRUST V. JOHN P. FITZGERALD, III, ACTING UNITED STATES TRUSTEE FOR REGION 4

Dear Sir or Madam:

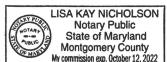
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* USA Sales, Inc. referenced above contains **3,841** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely

Jack Suber, Esq.

Principal



LISA KAY NICHOLSON | Sworn and subscribed before me this 3rd day of March 2022.

Lisa K Nicholson