

**CERTIFICATE OF WORD COUNT**

**No. 21-869**

Andy Warhol Foundation for the Visual Arts, Inc.,  
*Petitioner,*

v.

Lynn Goldsmith, et al.,  
*Respondents.*

STATE OF MASSACHUSETTS )  
COUNTY OF NORFOLK ) SS.:

Being duly sworn, I depose and say:

1. That I am over the age of 18 years and am not a party to this action. I am an employee of the Supreme Court Press, the preparer of the document, with mailing address at 1089 Commonwealth Avenue, Suite 283, Boston, MA 02215.

2. That, as required by Supreme Court Rule 33.1(h), I certify that the CALIFORNIA SOCIETY OF ENTERTAINMENT LAWYERS, ET AL. AMICUS AT MERITS STAGE IN SUPPORT OF RESPONDENTS contains 5203 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d).

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

  
\_\_\_\_\_  
G. Chan Sekhar

August 15, 2022