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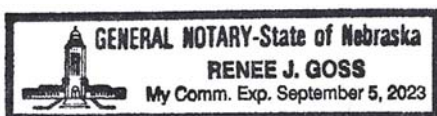
No. 21-984

HELIX ENERGY SOLUTIONS  
GROUP, INC.; HELIX WELL OPS, INC.,  
Petitioners,  
v.  
MICHAEL J. HEWITT,  
Respondent.

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF THE TEXAS OIL AND GAS ASSOCIATION, INC. AND THE AMERICAN PETROLEUM INSTITUTE AS AMICI CURIAE IN SUPPORT OF PETITIONERS in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 5961 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 9th day of February, 2022.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
\_\_\_\_\_  
Notary Public

*Andrew H. Cockle*  
\_\_\_\_\_  
Affiant