

No. 22-1241

In The

Supreme Court of the United States

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JOCELYN M. MURPHY, MICHAEL S. MURPHY, AND RICHARD C. GOUNAUD,  
*Petitioners,*

v.

SECURITIES AND EXCHANGE COMMISSION,  
*Respondent.*

**CERTIFICATE OF WORD COUNT**

I hereby certify on this 27th day of July, 2023, that the above referenced BRIEF OF SECURITIES SCHOLARS AND FORMER SEC OFFICIALS AS *AMICI CURIAE* IN SUPPORT OF PETITIONERS contains 4,032 words.

Respectfully submitted,

/S/ LYLE ROBERTS  
*Counsel of Record*  
MARK LANPHER  
SHEARMAN & STERLING LLP  
401 9th Street, NW  
Washington, DC 20004  
(202) 508-8108  
[lyle.roberts@shearman.com](mailto:lyle.roberts@shearman.com)  
*Counsel for Amici Curiae*