RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 22-500

Great Lakes Insurance SE,

Petitioner,

v.

Raiders Retreat Realty Co., LLC,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Carter G. Phillips, certify that the Brief For Amici Curiae Chamber Of Commerce Of The United States Of America And American Property Casualty Insurance Association Supporting Petitioner in the foregoing case contains 5,387 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.

Executed on June 2, 2023.

/s/ Carter G. Phillips CARTER G. PHILLIPS SIDLEY AUSTIN LLP 1501 K Street, N.W. Washington, DC 20005 (202) 736-8000