In the Supreme Court of the United States

WHIRLPOOL FINANCIAL CORPORATION & CONSOLIDATED SUBSIDIARIES, ET AL.,

Petitioners,

v.

COMMISSIONER OF INTERNAL REVENUE,

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Sixth Circuit

CERTIFICATE OF COMPLIANCE

In accordance with Supreme Court Rule 33.1(g), I certify that the foregoing *Amicus Curiae* Brief in Support of Petitioners contains 4,712 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.

Dated: August 4, 2022

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