

No. 17-2

IN THE  
**Supreme Court of the United States**

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UNITED STATES,

*Petitioner,*

v.

MICROSOFT CORPORATION,

*Respondent.*

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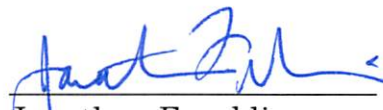
**WORD COUNT CERTIFICATION**

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As required by Supreme Court Rule 33.1(h), I, Jonathan Franklin, a member of the Bar of this Court, certify that the E-Discovery Institute et al.'s amicus brief supporting neither party contains 8,650 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on December 13, 2017.



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