No. 17-2

IN THE

Supreme Court of the United States

UNITED STATES,

Petitioner,

v.

MICROSOFT CORPORATION,

Respondent.

WORD COUNT CERTIFICATION

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.

Jonathan Franklin

NORTON ROSE FULBRIGHT US LLP 799 9th Street, NW, Suite 1000 Washington, DC 20001

(202) 662-0466