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January 11, 2018

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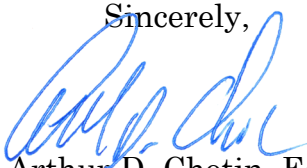
RE: No. 17-2: UNITED STATES OF AMERICA V. MICROSOFT CORPORATION

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Merits Brief for Respondent referenced above contains **15,000** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Arthur D. Chotin, Esq.
Principal