



CERTIFICATE OF COMPLIANCE

No. 17-2

UNITED STATES,

Petitioner,

v.

MICROSOFT CORPORATION,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Council of Bars and Law Societies of Europe as *Amicus Curiae* in Support of Respondent contains 7,808 words, excluding the parts of the Brief 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 January 18, 2018.

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: Jan 18, 2018

[Signature]

Notary Public

[seal]



JHNER
State of Ohio
Commission Expires
February 21, 2018