

**CERTIFICATE OF COMPLIANCE**

**No. 17-2**

UNITED STATES OF AMERICA,  
*Petitioner,*

v.

MICROSOFT CORPORATION,  
*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amici Curiae* of The Reporters Committee for Freedom of the Press and 40 Media Organizations (the “Amicus Brief”) contains 5,048 words, excluding the parts of the Amicus 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.

*/s/Bruce Brown*

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