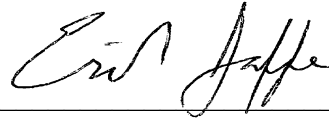


CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying BRIEF OF THE CATO INSTITUTE AS AMICUS CURIAE IN SUPPORT OF RESPONDENTS in Merck Sharp & Dohme Corp. v. Albrecht, No. 17-290, complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 4,175 words, based on the word-count function of Microsoft Word (Office 365), including footnotes and excluding material not required to be counted by Rule 33(d).

A handwritten signature in black ink, appearing to read "Erik S. Jaffe", is written above a horizontal line.

Erik S. Jaffe