

CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying BRIEF OF THE COMPETITIVE ENTERPRISE INSTITUTE AS AMICUS CURIAE IN SUPPORT OF RESPONDENTS in South Dakota v. Wayfair, Inc., No. 17-494, complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 6,863 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, reading "Erik S. Jaffe", is positioned above a horizontal line.

Erik S. Jaffe