

IN THE SUPREME COURT OF THE UNITED STATES

---

No. 17-571

FOURTH ESTATE PUBLIC BENEFIT CORPORATION,  
*Petitioner,*

v.

WALL-STREET.COM, LLC AND JERROLD D. BURBEN,  
*Respondents.*

---

**CERTIFICATE OF WORD COUNT**

---

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Supplemental Brief for Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains **1,509** words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 2013) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 5, 2018.



---

Aaron M. Panner  
*Counsel of Record for Petitioner*