

IN THE SUPREME COURT OF THE UNITED STATES

No. 17-904

LOUDOUN COUNTY, VIRGINIA,
Petitioner,

v.

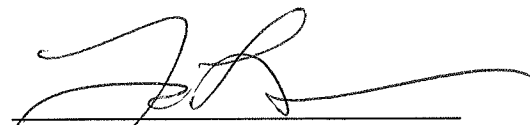
DULLES DUTY FREE, LLC,
Respondent.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of Professor Daniel J. Hemel as *Amicus Curiae* in Support of Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 5,946 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 January 25, 2018.



Jeffrey A. Love
*Counsel of Record for Amici
Tax Law Professors*