

Nos. 18-1334, 18-1475, 18-1496, 18-1514, 18-1521

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In the  
**Supreme Court of the United States**

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FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

v.

AURELIUS INVESTMENT, LLC, et al.,

AURELIUS INVESTMENT, LLC, et al.,

v.

COMMONWEALTH OF PUERTO RICO, et al.,

OFFICIAL COMM. OF UNSECURED CREDITORS OF ALL TITLE III  
DEBTORS OTHER THAN COFINA,

v.

AURELIUS INVESTMENT, LLC, et al.,

UNITED STATES OF AMERICA,

v.

AURELIUS INVESTMENT, LLC, et al.,

UNION DE TRABAJADORES DE LA INDUSTRIA ELECTRICA Y RIEGO, INC.,

v.

FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, et al.,

**On Writs of Certiorari to the United States  
Court of Appeals for the First Circuit**

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF PACIFIC LEGAL FOUNDATION CHALLENGING THE RULING ON THE *DE FACTO* OFFICER DOCTRINE contains 5,796 words, excluding the parts of the document 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 August 28, 2019.

S/ DANIEL M. ORTNER

DANIEL M. ORTNER

*Counsel of Record*

Pacific Legal Foundation

930 G Street

Sacramento, CA 95814

Telephone: (916) 419-7111

DOrtner@pacificlegal.org

*Counsel for Amicus Curiae*