

**CERTIFICATE OF WORD
COUNT**

- RE: NO. 18-1334: FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO V. AURELIUS INVESTMENT, LLC, ET AL.**
- RE: NO. 18-1475: AURELIUS INVESTMENT, LLC, ET AL. V. COMMONWEALTH OF PUERTO RICO, ET AL.**
- RE: NO. 18-1496: OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF ALL TITLE III DEBTORS OTHER THAN COFINA V. AURELIUS INVESTMENT, LLC, ET AL.**
- RE: NO. 18-1514: UNITED STATES V. AURELIUS INVESTMENT, LLC, ET AL.**
- RE: NO. 18-1521: UNIÓN DE TRABAJADORES DE LA INDUSTRIA ELÉCTRICA Y RIEGO, INC. V. FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, ET AL.**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of The Chamber of Commerce of the United States as *Amici Curiae* Challenging the *De Facto* Officer Doctrine Ruling referenced above contains **4,118** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

/s Ruthanne M. Deutsch

Ruthanne M. Deutsch
Deutsch Hunt PLLC
August 29, 2019