

No. 18-1501

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

CHARLES C. LIU, *et al.*, *Petitioners*,

v.

SECURITIES AND EXCHANGE COMMISSION, *Respondent*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the *Brief of Remedies and Restitution Scholars as Amici Curiae in Support of Neither Side* contains 7,998 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). The words were counted by Microsoft Word 2016.

I am counsel of record for amici and a member of the bar of this Court, and I declare under penalty of perjury that the foregoing statements are true and correct.

/s/ Douglas Laycock

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Douglas Laycock

December 23, 2019