

No. 18-1501

In the Supreme Court of the United States

CHARLES C. LIU, ET AL., *PETITIONERS*

v.

SECURITIES AND EXCHANGE COMMISSION

*ON WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE NINTH CIRCUIT*

CERTIFICATE OF COMPLIANCE

As required by Rule 33.1(h), I, Donald Burke, a member of the Bar of this Court, hereby certify that the Brief of *Amici Curiae* Law Professors in Support of Petitioners contains 6,875 words, excluding the parts of the brief 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 Word for Office 365) used to prepare the document.

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

DONALD BURKE
Counsel of Record
BRANDON L. ARNOLD
ROBBINS, RUSSELL, ENGLERT, ORSECK,
UNTEREINER & SAUBER LLP
2000 K Street, NW
Washington, DC 20006
(202) 775-4500
dburke@robbinsrussell.com