



CERTIFICATE OF COMPLIANCE

No. 18-302

ANDREI IANCU, Under Secretary of Commerce for
Intellectual Property and Director, Patent and
Trademark Office,

Petitioner,

v.

ERIK BRUNETTI,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the American Intellectual Property Law Association as *Amicus Curiae* in Support of Neither Party contains 5,850 words, excluding the parts of the Brief 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 February 25, 2019.

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: February 25, 2019

John A. Bailey
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023