

**No. 18-302**

ANDREI IANCU, UNDER SECRETARY OF COMMERCE FOR INTELLECTUAL PROPERTY AND  
DIRECTOR, PATENT AND TRADEMARK OFFICE,

*PETITIONER,*

V.

ERIK BRUNETTI,

*RESPONDENT.*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that Brief for the Cato Institute, et. al. as *Amici Curiae* in Support of Respondent contains 8,096 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro  
*Counsel of Record*