

IN THE

Supreme Court of the United States

APRIL HUGHES, ET AL., *Petitioners*,

v.

NORTHWESTERN UNIVERSITY, ET AL., *Respondents*.

CERTIFICATE OF COMPLIANCE

I, Jeffrey R. White, a member of the Bar of this Court, hereby certify, pursuant to Supreme Court Rule 33.1(h), that the brief of the American Association for Justice as amicus curiae in support of Petitioners in the above-captioned case contains 6,442 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

September 9, 2021

s/ Jeffrey R. White

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