

No. 19-1401

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

APRIL HUGHES, ET AL.,  
*Petitioners,*

v.

NORTHWESTERN UNIVERSITY, ET AL.,  
*Respondents.*

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**On Writ of Certiorari to the  
United States Court of Appeals  
for the Seventh Circuit**

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I, Meaghan VerGow, a member of the bar of this Court, certify on this 28th day of October 2021, that the Brief of the American Benefits Council as *Amicus Curiae* in the above-captioned case contains 6,901 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

*/s/ Meaghan VerGow*

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Meaghan VerGow