

IN THE
Supreme Court of the United States

UNITED STATES OF AMERICA,
Petitioner,

v.

ARTHREX, INC., *ET AL.*,
Respondents.

SMITH & NEPHEW, INC., ET AL.,
Petitioners,

v.

ARTHREX, INC., *ET AL.*,
Respondents.

ARTHREX, INC., *ET AL.*,
Petitioners,

v.

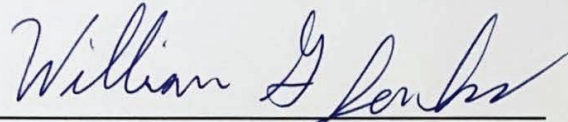
SMITH & NEPHEW, INC., ET AL.,
Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the BRIEF OF UNIFIED PATENTS, LLC AS *AMICUS CURIAE* IN SUPPORT OF NO PARTY AND IN SUPPORT OF REVERSAL in case No. 19-1434, 19-1452, 19-1458 contains **5,876** words, excluding parts of the document 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 the 2nd day of December 2020.

A handwritten signature in blue ink that reads "William G. Jenks". The signature is written in a cursive style with a horizontal line underneath it.

WILLIAM G. JENKS
Counsel of Record

JENKS IP LAW PLLC
1629 K ST., NW
Suite 300
Washington, D.C. 20006
wjenks@jenksiplaw.com
(202) 412-7964