

In the Supreme Court of the United States

Arthrex, Inc.,

Petitioner,

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 *Amicus Curiae* of TiVo Corporation Supporting Petitioner filed on behalf of *Amicus Curiae* TiVo Corporation contains 3,301 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 5th day of August 2020.

/s/ Michael E. Joffre

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