

No. 19-347

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IN THE  
**Supreme Court of the United States**

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AER ADVISORS INC.; WILLIAM J. DEUTSCH;  
PETER E. DEUTSCH,

*Petitioners,*

v.

FIDELITY BROKERAGE SERVICES, LLC,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief in Opposition in *AER Advisors Inc. v. Fidelity Brokerage Services, LLC*, No. 19-347, complies with the word limitations, as it contains 5,937 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: January 6, 2020

  
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Shay Dvoretzky