

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

---

FEDERAL REPUBLIC OF GERMANY, ET AL.,

*Petitioners,*

v.

ALAN PHILIPP, ET AL.,

*Respondents.*

---

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

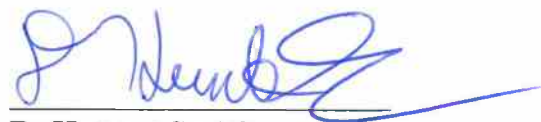
---

**CERTIFICATE OF COMPLIANCE**

---

As required by Rule 33.1(h), I, D. Hunter Smith, a member of the Bar of this Court, hereby certify that the Brief of Peter Toren as *Amicus Curiae* in Support of Respondents contains 7,509 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

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



D. Hunter Smith

October 29, 2020