

No. 20-222

GOLDMAN SACHS GROUP, INC., ET AL.,
Petitioners,

v.

ARKANSAS TEACHER RETIREMENT SYSTEM, ET AL.,
Respondents.

CERTIFICATE OF COMPLIANCE WITH THE WORD LIMITATIONS

I, Anthony G. Lantagne, hereby certify that the above referenced BRIEF OF AMICUS CURIAE WASHINGTON LEGAL FOUNDATION IN SUPPORT OF PETITIONERS, as indicated by the word count feature of MS Word, and including footnotes but excluding those parts enumerated for exclusion under the rules, contains 3,817 words.

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

Executed on this 24th day of September, 2020.



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COMMONWEALTH OF VIRGINIA)
CITY OF RICHMOND) to-wit:

Anthony G. Lantagne appeared before me this 24th day of September, 2020, and attested that the foregoing certificate is true and exact to the best of his knowledge and belief.



Richard Markell