

No. 20-222

**In the Supreme Court of the United States**

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GOLDMAN SACHS GROUP, INC., et al., PETITIONERS,

v.

ARKANSAS TEACHER RETIREMENT SYSTEM, et al.

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On Petition for a Writ of Certiorari  
to the United States Court of Appeals  
for the Second Circuit

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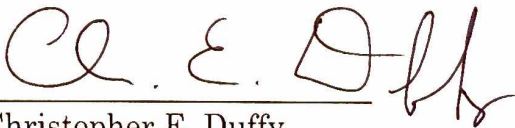
**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I, Christopher E. Duffy, a member of the Bar of this Court and an attorney for *amicus curiae* the Society for Corporate Governance, hereby certify that the "Brief of the Society for Corporate Governance as *Amicus Curiae* in Support of Petitioners" filed in the above-captioned matter contains 4,461 words, excluding the 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 September 24, 2020.

  
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Christopher E. Duffy  
Counsel for *Amicus Curiae*