

IN THE SUPREME COURT OF THE UNITED STATES

---

No. 20-222

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

v.

ARKANSAS TEACHER RETIREMENT SYSTEM, ET AL.

---

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

---

I, Kannon K. Shanmugam, counsel for petitioners and a member of the Bar of this Court, certify that the Brief for the Petitioners in the above-captioned case contains 12,964 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Kannon K. Shanmugam

January 25, 2021