



CERTIFICATE OF COMPLIANCE

No. 20-222

GOLDMAN SACHS GROUP, INC., ET AL.,

Petitioners,

v.

ARKANSAS TEACHER RETIREMENT SYSTEM, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Securities and Financial Markets Association, Bank Policy Institute, American Bankers Association, U.S. Chamber of Commerce, and American Property Casualty Insurance Association in Support of Petitioners contains 4,193 words, excluding the parts of the Brief 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 February 1, 2021.

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: February 1, 2021

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023