

No. 20-222

In the Supreme Court of the United States

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

v.

ARKANSAS TEACHER RETIREMENT SYSTEM, et al.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I 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 5,250 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 February 1, 2021.



Jeremy C. Marwell
Counsel for *Amicus Curiae*