

CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Brief of Historians as *Amici Curiae* in Support of Respondents in NCAA v. Alston and *AAC v. Alston*, Nos. 20-512 & -520 complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 4,888 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).

A handwritten signature in black ink, reading "Erik S. Jaffe", is positioned above a horizontal line. The signature is written in a cursive style.

Erik S. Jaffe