

No. 20-72

In the Supreme Court of the United States

JANET HIMSEL, ET AL.,

Petitioner,

v.

4/9 LIVESTOCK, LLC, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Andrew J. Pincus, counsel for Non-Governmental Respondents and a member of the Bar of this Court, hereby certify that, according to the word-count tool in Microsoft Word, the Brief of the Non-Governmental Respondents in Opposition consists of 4,928 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The Petition therefore complies with Rule 33.1(g).

/s/ Andrew J. Pincus

Andrew J. Pincus

Mayer Brown LLP

1999 K Street, N.W.

Washington, D.C. 20006-1101

(202) 263-3000

apincus@mayerbrown.com