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March 1, 2021

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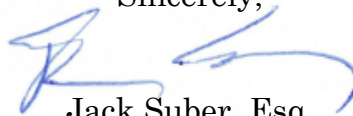
**RE NO. 20-891: AMERICAN AXLE & MANUFACTURING, INC. V. NEAPCO HOLDINGS
LLC, ET AL.**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Ameranth, Inc. referenced above contains **3,303** 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.

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 1st day of March 2021.

