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August 27, 2021

Clerk  
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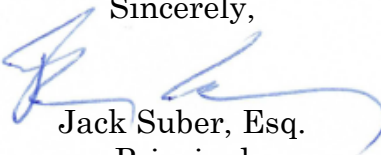
**RE NO. 21-118: APPLE INC. V. OPTIS CELLULAR TECHNOLOGY, LLC, ET AL.**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* ACT | The App Association referenced above contains **4,327** 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 27th day of August 2021.

