

IN THE SUPREME COURT
OF THE UNITED STATES

No. 21-1239

Securities and Exchange Commission, et al.

Petitioners

v.

Michelle Cochran

Respondent.

Certificate of Compliance With
Word Limitation

In accordance with Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of Atlantic Legal Foundation *Amicus Curiae* in Support of Respondent complies with the applicable word limit set forth in Rule 33.1(g): Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains **4,052** words. (Consistent with Rule 33.1(d), the undersigned is relying on the word count utility in Microsoft Word (Microsoft 365), the word processing program used to prepare the brief.)

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