

No. 21-1450

IN THE
Supreme Court of the United States

TÜRKIYE HALK BANKASI A.Ş, AKA HALKBANK,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Professors Ingrid (Wuerth) Brunk and William S. Dodge as *Amici Curiae* in Support of Neither Party contains 7,160 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.

Executed on November 21, 2022.

s/Barrett J. Anderson

BARRETT J. ANDERSON
COOLEY LLP
10265 Science Center Drive
San Diego, CA 92121
(858) 550-6000