

No. 21-312

In the Supreme Court of the United States

VOLKSWAGEN AKTIENGESELLSCHAFT, ET AL.,
Petitioners,

v.

OHIO, EX REL. DAVE YOST,
ATTORNEY GENERAL,
Respondent.

CERTIFICATE OF COMPLIANCE

I, Nicole A. Saharsky, hereby certify that, according to the word-count tool in Microsoft Word, the Brief for the Product Liability Advisory Council, Inc. and the Motor & Equipment Manufacturers Association as *Amici Curiae* in Support of Petitioners consists of 5,453 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The Brief therefore complies with Rule 33.1(g).



Dated: September 30, 2021

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