

No. 21-441

IN THE
Supreme Court of the United States

ALFRED H. SIEGEL, TRUSTEE OF THE CIRCUIT CITY
STORES, INC. LIQUIDATING TRUST,

Petitioner,

v.

JOHN P. FITZGERALD, III, ACTING UNITED STATES
TRUSTEE FOR REGION 4,

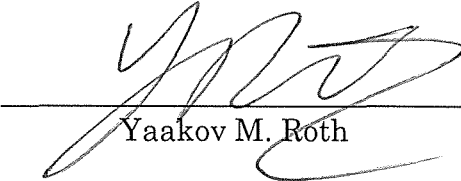
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for *Amicus Curiae* MF Global Holdings Ltd., as Plan Administrator, in Support of Petitioner in *Siegel v. Fitzgerald*, No. 21-441, complies with the word limitations, as it contains 5,085 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: March 3, 2022



Yaakov M. Roth