



**CERTIFICATE OF COMPLIANCE**

No. 21-757

AMGEN INC., ET AL.,

*Petitioners,*

v.

SANOFI, ET AL.,

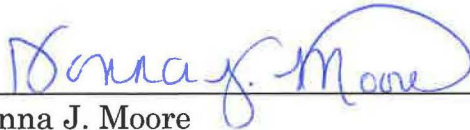
*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the American Intellectual Property Law Association as *Amicus Curiae* Suggesting Affirmance in 21-757, *Amgen Inc., et al. v. Sanofi, et al.* contains 4,501 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio  
County of Hamilton

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

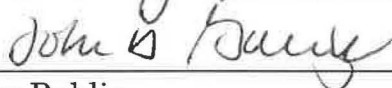
Executed on February 10, 2023.



Donna J. Moore  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: February 10, 2023

  
\_\_\_\_\_  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023