



**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 of Law Professors Joshua D. Sarnoff, Sharon K. Sandeen, and Ana Santos Rutschman as *Amici Curiae* in Support of Respondents contains 7,982 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.



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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