

**SUPREME COURT OF THE UNITED STATES**  
**CERTIFICATE OF COMPLIANCE**

No. 21-869

THE ANDY WARHOL FOUNDATION FOR THE VISUAL ARTS, INC.,

*Petitioners,*

*v.*

LYNN GOLDSMITH AND LYNN GOLDSMITH, LTD.,

*Respondents.*

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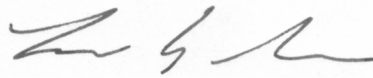
ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS  
FOR THE SECOND CIRCUIT

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As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Phoenix Center for Advanced Legal & Economic Public Policy Studies as Amici Curiae in Support of Respondents contains 7614 words, including footnotes but excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). In making this certification, I have relied upon the word count of the word-processing system used to prepare this Brief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct.

Executed on August 15, 2022



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Lawrence J. Spiwak  
Phoenix Center for Advanced Legal &  
Economic Public Policy Studies  
5335 Wisconsin Avenue, NW Suite 440  
Washington, D.C. 20015  
(202) 274-0235  
[lspiwak@phoenix-center.org](mailto:lspiwak@phoenix-center.org)