



**CERTIFICATE OF COMPLIANCE**

No. 22-704

KATHERINE K. VIDAL, Under Secretary of Commerce  
for Intellectual Property and Director, United States  
Patent and Trademark Office,

*Petitioner,*

v.

STEVE ELSTER,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the American Intellectual Property Law Association as *Amicus Curiae* in Support of Neither Party contains 4,756 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 August 1, 2023.



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

Date: August 1, 2023

John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028