

**CERTIFICATE OF COMPLIANCE**

No. 23-867

REPUBLIC OF HUNGARY, ET AL.,  
*Petitioners,*

v.

ROSALIE SIMON, ET AL.

As required by Supreme Court Rule 33.1(h), I certify that the AMICI CURIAE BRIEF OF THE 1939 SOCIETY, BET TZEDEK, CENTER FOR THE STUDY OF LAW & GENOCIDE, AND LOYOLA JUSTICE FOR ATROCITIES CLINIC IN SUPPORT OF RESPONDENTS contains **4,960** words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

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

Executed on October 18, 2024.

\_\_\_\_\_  
*s/Benjamin G. Shatz*  
Benjamin G. Shatz  
Counsel for Amici Curiae  
*The 1939 Society, Bet Tzedek,*  
*Center for the Study of Law and Genocide,*  
*and Loyola Justice for Atrocities Clinic*