In the Supreme Court of the United States

MSN PHARMACEUTICALS, INC.,

Petitioner,

v.

NOVARTIS PHARMACEUTICALS CORP.,

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Federal Circuit

CERTIFICATE OF COMPLIANCE

As required by this Court's Rule 33.1(h), I, David J. Zimmer, a member of the Bar of this Court, certify that the Brief of Professors Jonathan Masur and Lisa Ouellette as Amici Curiae in Support of the Petition contains 4,458 words, excluding the parts of the document that are exempted by Rule 33.1(d).

David J. Zimmer