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November 16, 2026

Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

RE 26-514: ERIC S. SMITH V. SECURITIES AND EXCHANGE COMMISSION, ET AL.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Pioneer New England Legal Foundation, referenced above contains **2,091** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,

Jack Suber, Esq.
Principal

LISA KAY NICHOLSON
Notary Public
State of Maryland
Montgomery County
My commission exp. October 12, 2030

Sworn and subscribed before me this 16th day of November 2026.

Lisa K Nicholson