IN THE

## Supreme Court of the United States

UNITED STATES OF AMERICA,

PETITIONER,

v.

ARTHREX, INC, ET AL,

RESPONDENTS.

## CERTIFCIATE OF COMPLIANCE

I, Alan B. Morrison, counsel of record for the amicus curiae Administrative, Constitutional, and Intellectual Property Law Professors, in support of petitioners in Nos. 19-1434 and 19-1452, do hereby certify, pursuant to Rule 33.1(h) of this Court, that this brief contains 7973 words, including footnotes, excluding the portions set forth in Rule 33.1(d).

/s/ Alan B. Morrison

November 30, 2020

