IN THE Supreme Court of the United States

UNITED STATES OF AMERICA,

V.

ARTHREX, INC., ET AL.,

Respondents.

SMITH & NEPHEW, INC., ET AL.,

V.

ARTHREX, INC., ET AL.,

Respondents.

ARTHREX, INC., ET AL.,

Petitioners,

V.

SMITH & NEPHEW, INC., ET AL.,

Petitioners,

V.

Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the BRIEF OF UNIFIED PATENTS, LLC AS *AMICUS CURIAE* IN SUPPORT OF NO PARTY AND IN SUPPORT OF REVERSAL in case No. 19-1434, 19-1452, 19-1458 contains <u>5,876</u> words, excluding 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.

Executed on the 2nd day of December 2020.

WILLIAM G. JENKS Counsel of Record

JENKS IP LAW PLLC 1629 K ST., NW Suite 300 Washington, D.C. 20006 wjenks@jenksiplaw.com (202) 412-7964