

**CERTIFICATE OF COMPLIANCE**

**Nos. 19-1434, 19-1452, 19-1458**

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UNITED STATES OF AMERICA,

*Petitioner,*

– v. –

ARTHREX, INC., *et al.*,

*Respondents.*

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SMITH & NEPHEW, INC., *et al.*,

*Petitioners,*

– v. –

ARTHREX, INC., *et al.*,

*Respondents.*

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ARTHREX, INC.,

*Petitioner,*

– v. –

SMITH & NEPHEW, INC., *et al.*,

*Respondents.*

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As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* contains 5,013 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

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

s/Nikolina Gurfinkel  
Nikolina Gurfinkel

Sworn to on this 30th day of  
December, 2020