



CERTIFICATE OF COMPLIANCE

No. 19-1434

UNITED STATES,

Petitioner,

v.

ARTHREX, INC., *et al.*,

Respondents.

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

Petitioners,

v.

ARTHREX, INC., *et al.*,

Respondents.

ARTHREX, INC.,

Petitioner,

v.

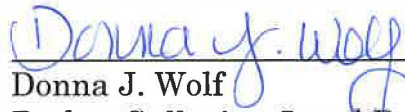
SMITH & NEPHEW, INC., *et al.*,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Professor John Harrison as *Amicus Curiae* in Support of Neither Party contains 4,733 words, excluding the parts of the Brief 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 December 1, 2020.



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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: December 1, 2020

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023