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February 4, 2020

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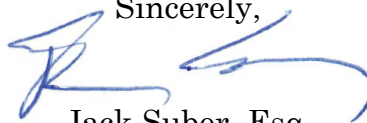
RE NO. 19-832: APPLE INC. V. VIRNETX INC., ET AL.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* ACT | THE APP ASSOCIATION referenced above contains **3,766** 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