IN THE SUPREME COURT OF THE UNITED STATES

Nos. 19-416 & 19-453

NESTLÉ USA, INC.,

AND

CARGILL, INC.,

Petitioners,

v.

 $\begin{array}{c} \hbox{John Doe I, et al.,} \\ Respondents. \end{array}$

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of International Law Scholars as *Amici Curiae* in Support of Respondents, which was prepared using Century Schoolbook 12-point typeface, contains 7,973 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 2013) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 21, 2020.

William S. Dodge

Counsel of Record for Amici International Law Scholars