IN THE SUPREME COURT OF THE UNITED STATES

No. 21-1100

3M Company; Arizant Healthcare, Inc.

Petitioners,

v.

George Amador,

Respondent.

Certificate of Compliance With Word Limitation

In accordance with Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of Atlantic Legal Foundation, Washington Legal Foundation, and DRI–The Voice of the Defense Bar as *Amici Curiae* in Support of Petitioners complies with the applicable word limit set forth in Rule 33.1(g): Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains **5**,788 words. (Consistent with Rule 33.1(d), the undersigned is relying on the word count utility in Microsoft Word (Microsoft Office 365), the word processing program used to prepare the brief.)

<u>/s/ Lawrence S. Ebner</u> LAWRENCE S. EBNER ATLANTIC LEGAL FOUNDATION 1701 Pennsylvania Ave., NW Washington, DC 20006 (202) 729-6337

March 3, 2022