In the Supreme Court of the United States

ROBERT MALLORY,

Petitioner,

v.

NORFOLK SOUTHERN RAILWAY CO.,

Respondent.

On Petition for Writ of Certiorari to the Pennsylvania Supreme Court

CERTIFICATE OF WORD-COUNT COMPLIANCE

I hereby certify in accordance with Supreme Court Rule 33.1 that the *Amici Curiae* Brief in Support of Respondent by the Commonwealth of Virginia and Seven Other States in case number 21-1168, styled *Mallory v. Norfolk Southern Railway Co.*, is within the requisite word and page limits set by the Court for such documents in that the document's word count, counting those items required to be included in the limits set by the Court, is 8,963 words.

/s/ Andrew N. Ferguson
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