IN THE SUPREME COURT OF THE UNITED STATES

No. 21-1272

MONSANTO COMPANY,

Petitioner,

v.

ALBERTA PILLIOD AND ALVA PILLIOD,

Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify under Supreme Court Rules 33.1(g) and (h) that Washington Legal Foundation's and Allied Educational Foundation's brief in this case contains 4,164 words, excluding those portions of the brief exempted by Supreme Court Rule 33.1(d).

nn M. Masslon II

April 19, 2022