## IN THE SUPREME COURT OF THE UNITED STATES

Nos. 21-1326, 22-111

UNITED STATES EX REL. TRACY SCHUTTE ET AL., Petitioners,

v.

SUPERVALU INC. ET AL.,

Respondents.

UNITED STATES EX REL. THOMAS PROCTOR, Petitioner,

v.

SAFEWAY, INC.,

Respondent.

## CERTIFICATE OF COMPLIANCE

I hereby certify under Supreme Court Rules 33.1(g) and (h) that Washington Legal Foundation's brief in this case contains 4,687 words, excluding those portions of the brief exempted by Supreme Court Rule 33.1(d).

John M. Masslon II

March 27, 2023