In the Supreme Court of the United States

NATIONAL PORK PRODUCERS COUNCIL & AMERICAN FARM BUREAU FEDERATION,

Petitioners,

v.

KAREN ROSS, et al.

On Petition for Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

CERTIFICATE OF WORD COUNT

I hereby certify that the accompanying brief Brief of North Carolina Chamber Legal Institute, North Carolina Pork Council, North Carolina Farm Bureau, and 11 Other State Farm Bureaus, Pork Councils, and Business Groups as *Amici Curiae* Supporting Petitioners complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 5,984 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).

November 18, 2021

Erik S. Jaffe