IN THE SUPREME COURT OF THE UNITED STATES

No. 21-468

NATIONAL PORK PRODUCERS COUNCIL AND AMERICAN FARM BUREAU FEDERATION,

Petitioners,

v.

KAREN ROSS, IN HER OFFICIAL CAPACITY AS SECRETARY OF THE CALIFORNIA DEPARTMENT OF FOOD & AGRICULTURE ET AL.,

Respondents.

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 4,120 words, excluding those portions of the brief exempted by Supreme Court Rule 33.1(d).

ghn M. Masslon II

June 17, 2022