IN THE SUPREME COURT OF THE UNITED STATES

No. 23-217

E.M.D. SALES, INC.; ELDA M. DEVARIE,

Petitioners,

v.

FAUSTINO SANCHEZ CARRERA; JESUS DAVID MURO; MAGDALENO GERVACIO,

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 3,923 words, excluding those portions of the brief exempted by Supreme Court Rule 33.1(d).

Harber II

John M. Masslon II

October 6, 2023