

IN THE SUPREME COURT  
OF THE UNITED STATES

No. 21-241

*Monsanto Company*

*Petitioner,*

v.

*Edwin Hardeman*

*Respondent.*

---

Certificate of Compliance With  
Word Limitation

In accordance with Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of Atlantic Legal Foundation As *Amicus Curiae* In Support of Petitioner complies with the applicable word limit set forth in Rule 33.1(g): Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 5,550 words. (Consistent with Rule 33.1(d), the undersigned is relying on the word count utility in Microsoft Word (Microsoft 365), the word processing program used to prepare the brief.)

/s/ Lawrence S. Ebner  
LAWRENCE S. EBNER  
ATLANTIC LEGAL FOUNDATION  
1701 Pennsylvania Ave., NW  
Washington, DC 20006  
(202) 729-6337

August 31, 2021