## IN THE SUPREME COURT OF THE UNITED STATES

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No. 24-1068

MONSANTO COMPANY,

Petitioner,

v.

JOHN L. DURNELL,

Respondent.

## CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Supplemental Brief for Respondent, which was prepared using Century Schoolbook 12-point typeface, contains 2,983 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 365) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 16, 2025.

David C. Frederick

Counsel of Record for Respondent

Dail C. Forlick