**IN THE SUPREME COURT OF THE UNITED STATES**

No. 24-1068

Monsanto Company,

*Petitioner,*

v.

John L. Durnell,

*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 **3,651** 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
lawrence.ebner@atlanticlegal.org

February 24, 2026