

No. 24-1068

In the
Supreme Court of the United States

MONSANTO COMPANY,

Petitioner,

v.

JOHN L. DURNELL,

Respondent.

On Writ of Certiorari to the Missouri Court of Appeals

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Pursuant to Supreme Court Rule 33.1(h), I hereby certify that the Brief of American Free Enterprise Chamber of Commerce as *Amicus Curiae* contains 5,379 words, excluding parts of the document exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

Executed March 2, 2026

/s/ James R. Conde
James R. Conde
Counsel of Record