

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

Pursuant to Supreme Court Rule 33.1(h), I hereby certify that the foregoing Brief of Amicus Curiae the Veterans of Foreign Wars of the United States in Support of Respondent contains 6,094 words, excluding the 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 this 1st day of April 2026.

/s/ Gerson H. Smoger

Gerson H. Smoger
Attorney for Amicus Curiae