

CERTIFICATE OF COMPLIANCE

No. 24-1068

Monsanto Company,
Petitioner,

v.

John L. Durnell,
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Former EPA Officials and Environmental Protection Network as *Amici Curiae* in Support of Respondent contains 6,868 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.
Executed on April 1, 2026.



Dana Kaersvang