

No. 25-225
IN THE
Supreme Court of the United States

MSN PHARMACEUTICALS, INC., ET AL.,
Petitioners,

v.

NOVARTIS PHARMACEUTICALS CORPORATION,
Respondent.

CERTIFICATE OF WORD COUNT

I, Adam G. Unikowsky, counsel for petitioner and a member of the Bar of this Court, certify pursuant to Supreme Court Rule 33.1(h) that the Brief for Sigmapharm Laboratories, LLC, as *Amicus Curiae* in Support of Petitioners in the above-captioned case contains **4,767** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dated: October 8, 2025

/s/ Adam G. Unikowsky
Adam G. Unikowsky