

No. 25-452

IN THE
Supreme Court of the United States

UNITEDHEALTHCARE INSURANCE COMPANY, ET AL.,
Petitioners,

v.

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD.,
ET AL.,
Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of the American Benefits Council, the ERISA Industry Committee, America's Health Insurance Plans, Inc., and the Nevada Association of Health Plans as *Amici Curiae* in Support of Petitioners contains 5,992 words and complies with the word limitation established by Rule 33.1(g)(x) of the Rules of this Court.

Dated: November 14, 2025

/s/ Matthew S. Rozen

Matthew S. Rozen