
No. 25-840

In the
Supreme Court of the United States

INTERNATIONAL PARTNERS FOR ETHICAL CARE, INC., *et al.*,
Petitioners,

v.

BOB FERGUSON, GOVERNOR OF WASHINGTON, *et al.*,
Respondents.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of Amicus Curiae Sutherland Institute in Support of Petitioners, which was prepared using Century Schoolbook 12-point typeface, contains 2,333 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 17th day of February 2026.

Respectfully submitted,

/s/ William C. Duncan

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