

IN THE SUPREME COURT OF THE UNITED STATES

No. 25-919

Union Carbide Corp., et al.,

*Petitioners,*

v.

Lee Ann Sommerville,

*Respondent.*

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**Certificate of Compliance With  
Word Limitation**

In accordance with Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of Atlantic Legal Foundation as *Amicus Curiae* In Support of Petitioners complies with the applicable word limit set forth in Rule 33.1(g): Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains **4,601** words. (Consistent with Rule 33.1(d), the undersigned is relying on the word count utility in Microsoft Word (Microsoft 365), the word processing program used to prepare the brief.)

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