No. 26-109

In the Supreme Court of the United States

J.R. SIMPLOT COMPANY, LLC, PETITIONER,

v.

SHOSHONE-BANNOCK TRIBES
OF THE FORT HALL RESERVATION, ET AL.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Reply Brief for Petitioner contains 2,997 words and complies with the word limitation established by Rule 33.1(g)(iii) of the Rules of this Court.

Dated: November 3, 2026

/s/ Patrick J. Fuster
Patrick J. Fuster