

IN THE SUPREME COURT OF THE UNITED STATES

No. 26-235

PHILIP MORRIS USA INC.,

Petitioner,

v.

ARMAND FONTAINE, individually and as
Personal Representative of the Estate of Barbara Ellen Fontaine,

Respondent.

PROOF OF SERVICE

I certify that on this 4th day of September 2026, three copies of WLF's
amicus brief were mailed to the following:

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I also certify that an electronic copy of WLF's brief was sent to each counsel listed above and that all parties required to be served have been served.

A handwritten signature in black ink, reading "Cory L. Andrews". The signature is written in a cursive, flowing style.

Cory L. Andrews
WASHINGTON LEGAL FOUNDATION

Dated: September 4, 2026