

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.

CERTIFICATE OF WORD COUNT

I, Lawrence Ebner, counsel for *amicus curiae* and a member of the Bar of this Court, certify that the Brief of the Federation of Defense & Corporate Counsel as *Amicus Curiae* Supporting Petitioner in the above-captioned case contains 3,084 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Lawrence Ebner

LAWRENCE EBNER

September 23, 2026