

No. 26-235

IN THE
Supreme Court of the United States

PHILIP MORRIS USA INC.,

Petitioner,

v.

ARMAND FONTAINE, individually and as special personal representative of the Estate
of Barbara Ellen Fontaine,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for
Amicus Curiae R.J. Reynolds Tobacco Company in Support of Petitioner in *Philip
Morris USA Inc. v. Fontaine*, No. 26-235, complies with the word limitations, as it
contains 4,663 words, excluding the words exempted by Supreme Court Rule 33.1(d).

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

Date: September 23, 2026

/s/ Noel J. Francisco
Noel J. Francisco