

IN THE SUPREME COURT OF THE UNITED STATES

No. 26-4

Samsung Electronics America, Inc.,

Petitioner,

v.

Jordan Brewer,

Respondent.

**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 Petitioner 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 **3,102** 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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