

IN THE SUPREME COURT OF THE UNITED STATES

No. 23-1187

Food and Drug Administration, et al.,

*Petitioners*

v.

R.J. Reynolds Vapor Co., et al.,

*Respondents.*

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**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 Respondents 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 **3,776** 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.)

/s/ Lawrence S. Ebner

Lawrence S. Ebner

Atlantic Legal Foundation

1701 Pennsylvania Ave., NW

Washington, DC 20006

(202) 729-6337

lawrence.ebner@atlanticlegal.org

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