In the Supreme Court of the United States

MEDICAL MARIJUANA, INC., ET AL., Petitioners, υ.

Douglas J. Horn.

CERTIFICATE OF COMPLIANCE WITH WORD LIMIT

I, Donald M. Falk, a member of the Bar of this Court, hereby certify that the accompanying Brief for Chamber of Commerce of the United States of America, Product Liability Advisory Council, and American Tort Reform Association as Amici Curiae in Support of the Petitioners, contains 6,141 words, exclusive of the sections excepted by Supreme Court Rule 33.1(d), and thus complies with the word limits of Rule 33.1(g)(xii).

> /s/Donald M. Falk Donald M. Falk Counsel of Record SCHAERR | JAFFE LLP Four Embarcadero Center Suite 1400 San Francisco, CA 94111 Telephone: (415) 562-4942 dfalk@schaerr-jaffe.com Counsel for Applicant

July 16, 2024