IN THE SUPREME COURT OF THE UNITED STATES

No. 23-871

LOTUS VAPING TECHNOLOGIES, LLC,

Petitioner,

v.

UNITED STATES FOOD AND DRUG ADMINISTRATION,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify under Supreme Court Rules 33.1(g) and (h) that Washington Legal Foundation's brief in this case contains 4,642 words, excluding those portions of the brief exempted by Supreme Court Rule 33.1(d).

John M. Masslon II

March 11, 2024