In the Supreme Court of the United States

LOTUS VAPING TECHNOLOGIES, LLC. *Petitioner*,

v.

UNITED STATES FOOD & DRUG ADMINISTRATION, Respondent.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33(1)(h), I certify that the BRIEF OF VAPING INDUSTY STAKEHOLDERS AS *AMICI CURIAE* IN SUPPORT OF PETITIONER complies with the word limitations in Rule 33(1)(g). It contains 5,890 words, including footnotes, but excluding sections exempted from the word count by Rule 33(1)(d).

This the 14th day of March 2024.

/s/ J. Gregory Troutman

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