In the Supreme Court of the United States

THE AMERICAN LEGION, ET AL., Petitioners,

v.

THE AMERICAN HUMANIST ASSOCIATION, ET AL., Respondents.

MARYLAND-NATIONAL CAPITAL PARKS AND PLANNING COMMISSION, Petitioner,

v.

THE AMERICAN HUMANIST ASSOCIATION, ET AL., RESPONDENTS.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Brief of The American Civil Rights Union as Amicus Curiae In Support Of Petitioner in cases Nos. 17-1717 and 18-18 contains 3,928 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 21st day of December 2018.

HN J. PARK, JR

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