In the

Supreme Court of the United States

THE AMERICAN LEGION, ET AL.,

Petitioners,

v.

AMERICAN HUMANIST ASSOCIATION, ET AL.,

Respondents.

MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION,

Petitioner,

v.

AMERICAN HUMANIST ASSOCIATION, ET AL., Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Major General Patrick Brady and Veterans Groups Erecting and Maintaining War Memorials as Amici Curiae in Support of Petitioners contains 5,996 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

Executed on July 26, 2018.

Christiana M. Holcomb

Alliance Defending Freedom

440 1st Street NW

Suite 600

Washington, D.C. 20001

(202) 393-8690

Counsel for Amici Curiae