

IN THE
Supreme Court of the United States

TREE OF LIFE CHRISTIAN SCHOOLS,
Petitioner,
v.
CITY OF UPPER ARLINGTON, OHIO
Respondent.

On Petition for Writ of Certiorari to the United States
Court of Appeals for the Sixth Circuit

**AMICUS CURIAE BRIEF OF AMERICAN CENTER FOR LAW AND
JUSTICE IN SUPPORT OF PETITIONER**

CERTIFICATE OF COMPLIANCE

Laura B. Hernandez, a member of the Bar of this Court and an attorney for amicus, pursuant to Rule 33.1(h), hereby certifies that the *Amicus Curiae* Brief of the American Center for Law and Justice in Support of Petitioners complies with the word limitations of Rule 33.1(h). The brief, excluding the parts mentioned in Rule 33.1(d), contains 3,760 words, including footnotes.

Laura B. Hernandez
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February 19, 2019