SUPREME COURT OF THE UNITED STATES

No. 18-944

TREE OF LIFE CHRISTIAN SCHOOLS,

Petitioner,

v.

CITY OF UPPER ARLINGTON, OHIO,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3921 words, excluding the 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 this 19th day of February, 2019.

Mariana Braylovskiy

Sworn to and subscribed before me this 19th day of February, 2019.

Elias Melendez

Notary Public State of New York

No. 24-4799661

Qualified in Kings County

Commission Expires Aug. 31, 2021