CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief *Amici Curiae* of National Legal Foundation, *et al.*, supporting the Petitioners in No. 19-1184, *Bruni, et al.* v. *City of Pittsburgh, Pa., et al.* contains 1,845 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

April 29, 2020

<u>/s/ Frederick W. Claybrook, Jr.</u>
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