

## CERTIFICATE OF COMPLIANCE

No. 19-123

SHARONELL FULTON, ET AL.,

Petitioners.

v.

CITY OF PHILADELPHIA, PENNSYLVANIA, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of Professor Eugene Volokh in Support of Neither Party contains 7,995 words, excluding the parts of the Brief 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 June 2, 2020.

Donna J. Wolf

Becker Gallagher Legal Publishing, Inc. 8790 Governor's Hill Drive, Suite 102

Cincinnati, OH 45249

(800) 890-5001

Sworn to and subscribed before me by said Affiant on the date designated below.

Date: June 2, 2020

John M. Durch

Notary Public

[seal]

JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires February 14, 2023