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August 20, 2020

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE NO. 19-123: SHARONELL FULTON, ET AL. V. CITY OF PHILADELPHIA, PENNSYLVANIA, ET AL.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Church-State Scholars referenced above contains **7,992** 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.

- le

Sincerely,

Jack Suber, Esq. Principal

Isa K nicholson