In The Supreme Court of the United States

SHARONELL FULTON, ET AL.,

Petitioners,

v.

CITY OF PHILADELPHIA, ET AL., Respondents.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Lee C. Bollinger, Erwin Chemerinsky, Burt Neuborne, Robert C. Post and Geoffrey Stone as *Amici Curiae* in Support of Respondents contains 5,265 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d), in compliance with the word limit set forth in Supreme Court Rule 33.1(g)(xiv).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 20, 2020.

/s/ Jonathan L. Marcus Jonathan L. Marcus