

No. 19-1388

In the Supreme Court of the United States

JASON SMALL, *Petitioner*,

v.

MEMPHIS LIGHT, GAS & WATER, *Respondent*.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the *Brief of Religious Liberty Scholars, et al. as Amici Curiae in Support of Petitioner* contains 5,996 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). The words were counted by Microsoft Word 2016.

I am counsel of record for amici and a member of the bar of this Court, and I declare under penalty of perjury that the foregoing statements are true and correct.

/s/ Douglas Laycock

Douglas Laycock

July 20, 2020