

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. 19-267, *Our Lady of Guadalupe School v. Agnes Morrissey-Berru*, contains, 1,403 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

September 30, 2019

/s/ Frederick W. Claybrook, Jr.

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