In the Supreme Court of the United States

OUR LADY OF GUADALUPE SCHOOL,

Petitioner,

V.

AGNES MORRISSEY-BERRU,

Respondent.

ST. JAMES SCHOOL,

Petitioner,

V.

DARRYL BIEL,

CERTIFICATE OF COMPLIANCE

I, Donald M. Falk, counsel for Independent Women's Law Center, hereby certify that, according to the word-count tool in Microsoft Word, the *Amicus Curiae* Brief of Independent Women's Law Center in support of Petitioners consists of 3,954 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The Petition therefore complies with Rule 33.1(g).

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