## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 19-348

## St. James School,

Petitioner,

v.

## Darryl Biel, as Personal Representative of the Estate of Kristen Biel,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Eric D. McArthur, certify that the Brief of *Amici Curiae* General Conference of Seventh-day Adventists and Jewish Coalition for Religious Liberty in Support of Petitioner in the foregoing case contains 4,547 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.

Executed on October 17, 2019.

/s/ Eric D. McArthur ERIC D. MCARTHUR SIDLEY AUSTIN LLP 1501 K Street, N.W. Washington, D.C. 20005 (202) 736-8000