

CERTIFICATE OF COMPLIANCE

No. 19-351

FEDERAL REPUBLIC OF GERMANY, ET AL.,

Petitioners,

v.

ALAN PHILIPP, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amici Curiae* of the National Jewish Commission on Law and Public Affairs ("COLPA") and Seven National Orthodox Jewish Organizations contains 2,781 words, respectively, excluding the parts of the Brief 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 19, 2020.

muay ubel

Donna J. Wolf

Becker Gallagher Legal Publishing, Inc. 8790 Governor's Hill Drive, Suite 102

Cincinnati, OH 45249

(800) 890-5001

Sworn to and subscribed before me by said Affiant on the date designated below.

Date: Octobre 19, 2020

Son D. Deelle

Notary Public

[seal]