No. 19-988

IN THE

Supreme Court of the United States

LIVING ESSENTIALS, LLC, ET AL.

PETITIONERS,

V.

WASHINGTON,

RESPONDENT.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of Liberty Justice Center supporting petitioners' application for certiorari contains 4,488 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 March 26, 2020.

s/ Jeffrey M. Schwab
Jeffrey M. Schwab
Counsel of Record
LIBERTY JUSTICE CENTER
190 LaSalle St., Ste. 1500
Chicago, IL 60603
(312) 263-7668
jschwab@libertyjusticecenter.org