## In the Supreme Court of the United States

CITY OF AUSTIN, TEXAS, Petitioner, v.

On Writ of Certiorari to the United States Court of Appeals for the Fifth Circuit

## CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Brief of Protect the First Foundation as *Amicus Curiae* Supporting Respondents in *Austin* v. *Reagan National Advertising of Austin, LLC*, No. 20-1029 complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 3,352 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).

Gene C. Schaerr

September 29, 2021