CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief *Amici Curiae* of Concerned Women for America, *et al.*, in support of the Petitioners in No. 20-1088; *David Carson, as Parent and Next Friend of O. C., et al., Petitioners v. A. Pender Makin;* contains 5,932 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

September 10, 2021

/s/ Frederick W. Claybrook, Jr.
FREDERICK W. CLAYBROOK, JR.
Counsel of Record
CLAYBROOK LLC
700 Sixth St., N.W., Ste. 430
Washington, D.C. 20001
tel. (202) 250-3833
Rick@claybrooklaw.com