CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amici Curiae* of the National Legal Foundation, *et al.*, supporting granting the Petition in No. 20-1158, *The North American Mission Board of the Southern Baptist Convention, Inc. v. McRaney* contains 1,429 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

March 25, 2021

<u>/s/ Frederick W. Claybrook, Jr.</u>
FREDERICK W. CLAYBROOK, JR. *Counsel of Record*Claybrook LLC
700 Sixth St., NW, Ste. 430
Washington, D.C. 20001
(202) 250-3833
rick@claybrooklaw.com