In the Supreme Court of the United States

BRADLEY BOARDMAN, A WASHINGTON INDIVIDUAL PROVIDER, ET AL., PETITIONERS

v.

JAY INSLEE, GOVERNOR OF WASHINGTON, ET AL.

CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Brief of Protect the 1st as *Amicus Curiae* Supporting Petitioners in *Boardman v. Inslee*, No. 20-1334 complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 2,783 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

mcal