No. 20-1747

IN THE Supreme Court of the United States

ERICH SORENSON,

Petitioner,

v.

MASSACHUSETTS,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for Amicus Curiae The Rutherford Institute in Support of Petitioner in Sorenson v. Massachusetts, No. 20-1747, complies with the word limitations, as it contains 5,266 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: July 16, 2021

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Anthony J. Dick