

No. 20-1800

In the Supreme Court of the United States

HAROLD SHURTLEFF, *ET AL.*, *Petitioners*,

v.

CITY OF BOSTON, MASSACHUSETTS, *ET. AL.*

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the accompanying Brief of Protect the First Foundation as *Amicus Curiae* Supporting Petitioners in *Shurleff v. Boston*, No. 20-1800, contains 4,567 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33.1(d).

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

Executed on November 22, 2021.



Erik S. Jaffe