In the Supreme Court of the United States

JEFF SCHULZ, ELLEN SCHULZ, LIZ CEDERGREEN, DAVID MARTIN,
LINDSEY MCDOWELL, GEORGE NORRIS,
NATHAN ORONA, AND KATHRYN OSTROM, AS TRUSTEES OF THE FIRST
PRESBYTERIAN CHURCH OF SEATTLE, A WASHINGTON NONPROFIT
CORPORATION,

Petitioners.

v.

THE PRESBYTERY OF SEATTLE, ET AL.,

Respondents.

 $ON\,PETITION\,FOR\,WRIT\,OF\,CERTIORARI\,TO$ THE COURT OF APPEALS FOR THE STATE OF WASHINGTON

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief Amicus Curiae of the Becket Fund for Religious Liberty in Support of Petitioners in the above captioned case contains 5,828 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). The words were counted by Microsoft Office 2019.

I am counsel of record for amicus and a member of the Bar of this Court, and I declare under penalty of perjury that the foregoing is true and correct.

/s/ Luke W. Goodrich Luke W. Goodrich

Executed on October 2, 2020.