

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief *Amicus Curiae* of The Justice Foundation, supporting the Petitioners' Petition for a Writ of Certiorari in No. 20-618, *Routten v. Routten*, contains 2,340 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

December 7, 2020

/s/ Allan E. Parker Jr.

Allan E. Parker Jr.

Counsel of Record

The Justice Foundation

8023 Vantage Dr., Suite 1275

San Antonio, TX 78230

(210) 614-7157

Parker4justice@gmail.com