

## 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.

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