IN THE SUPREME COURT OF THE UNITED STATES

No. 21-1397

IN RE GRAND JURY

CERTIFICATE OF COMPLIANCE

I hereby certify under Supreme Court Rules 33.1(g) and (h) that Washington Legal Foundation's brief in this case contains 4,512 words, excluding those portions of the brief exempted by Supreme Court Rule 33.1(d).

John M. Masslon II

June 1, 2022