

**IN THE  
SUPREME COURT OF THE UNITED STATES**

NO. 21-144

Seattle's Union Gospel Mission,  
*Petitioner,*

v.

Matthew S. Woods,  
*Respondent.*

**CERTIFICATE OF COMPLIANCE WITH RULE  
33.1(g)**

I, Kristine L. Brown, counsel of record for Westminster Theological Seminary, hereby certify that, according to the word-count tool in Microsoft Word, the Brief of Westminster Theological Seminary as Amicus Curiae in Support of Petitioner consists of 3,302 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The Brief therefore complies with Rule 33.1(g)

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