CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Brief of American Association ofChristian Association for Biblical Higher Education, and Association of Classical Christian Schools, ss Amici Curiae in Support of Petitioners, in Woods v. Seattle Union Gospel Mission, No. 21-144, complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 2,056 words, based on the wordcount function of Microsoft Word - Office 365, including footnotes and excluding material not required to be counted by rule 33(d).

George M. Ahrend