No. 21-164

IN THE

Supreme Court of the United States

TRUSTEES OF THE NEW LIFE IN CHRIST CHURCH,

Petitioners,

v.

CITY OF FREDERICKSBURG, VIRGINIA,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Reply Brief for Petitioners contains 2,849 words and complies with the word limitation established by Rule 33.1(g)(iii) of the Rules of this Court.

Dated: September 22, 2021

/s/ Allyson N. Ho
Allyson N. Ho