## In The Supreme Court of the United States

V.

 $\begin{array}{c} \text{Bremerton School District,} \\ Respondent. \end{array}$ 

On Writ of Certiorari To The United States Court of Appeals For The Ninth Circuit

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 1st day of April, 2022, that the Brief of City, County, and Local Public Employer Organizations as *Amici Curiae* in Support of Respondent in the above-captioned case contains 7,803 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

<u>/s/ Michael R. Dreeben</u>
Michael R. Dreeben