

No. 21-800

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In the  
**Supreme Court of the United States**

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TONY K. McDONALD, et al.,

*Petitioners,*

v.

SYLVIA BORUNDA FIRTH, et al.

*Respondents.*

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**On Petition for Writ of Certiorari to the  
United States Court of Appeals for the Firth Circuit**

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF PACIFIC LEGAL FOUNDATION, CATO INSTITUTE, ATLANTIC LEGAL FOUNDATION, AND REASON FOUNDATION IN SUPPORT OF PETITIONERS contains 4,182 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 13, 2022.



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DEBORAH J. LA FETRA

*Counsel of Record*

Pacific Legal Foundation  
555 Capitol Mall, Suite 1290  
Sacramento, California 95814  
Telephone: (916) 419-7111  
Facsimile: (916) 419-7747  
DLafetra@pacificallegal.org

*Counsel for Amici Curiae*