IN THE

Supreme Court of the United States

GERALD E. GROFF, Petitioner,

v.

Louis DeJoy, Postmaster General, United States Postal Service, Respondent.

> On Petition for Writ of Certiorari to the United States Court of Appeals for the Third Circuit

AMICUS BRIEF OF AMERICAN CENTER FOR LAW AND JUSTICE IN SUPPORT OF PETITIONER

CERTIFICATE OF WORD COUNT

Jay Alan Sekulow, a member of the Bar of this Court and an attorney for amicus, pursuant to Rule 33.1(h), hereby certifies that the *Amicus Curiae* Brief of the American Center for Law and Justice in Support of Petitioner complies with the word limitations of Rule 33.1(h). The brief, excluding the parts mentioned in Rule 33.1(d), contains 3,052 words, including footnotes.

Jay Alan Sekulow