



**CERTIFICATE OF COMPLIANCE**

No. 22-174

GERALD E. GROFF,

*Petitioner,*

v.

LOUIS DEJOY, POSTMASTER GENERAL,  
UNITED STATES POSTAL SERVICE,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Louis D. Brandeis Center for Human Rights Under Law in Support of Petitioner contains 4,350 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio  
County of Hamilton

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

Executed on February 28, 2023.

Donna J. Moore

Donna J. Moore  
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Sworn to and subscribed before me by said Affiant on the date designated below.

Date: February 28, 2023

John D. Gallagher

Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028