CERTIFICATE OF COMPLIANCE

No. 22-174

GERALD E. GROFF,

Petitioner,

v.

LOUIS DEJOY, POSTMASTER GENERAL,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Americans United for Separation of Church and State and Lambda Legal Defense and Education Fund, Inc. in Support of Respondent contains 7,037 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 March 30, 2023.

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

Date: March 30, 2023
John 11 Bally

Notary Public

[seal]

JOHN D. GALLAGHER twotary - blic, State of Ohio My Commission Expires February 14, 2028