

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 22-281

PETER KRUITHOFF,

Petitioner,

v.

CATHOLIC CHARITIES WEST MICHIGAN, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I, Collin P. Wedel, certify that the Brief of Amici Curiae Nonprofit Adoption Advocacy Organizations in Support of Petitioner in the foregoing case contains 3801 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 October 26, 2022.

/s/ Collin P. Wedel
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