

No. 22-498

IN THE
Supreme Court of the United States

KRISTINE KURK,

Petitioner,

v.

LOS RIOS CLASSIFIED EMPLOYEES ASSOCIATION *et al.*,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the brief for *amicus curiae* Liberty Justice Center contains 3,839 words, excluding the parts of the brief 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 December 28, 2022.



Jeffrey Schwab

Counsel of Record

Liberty Justice Center

440 N. Wells Street, Suite 200

Chicago, Illinois 60654

312-637-2280

jschwab@libertyjusticecenter.org