

No. 20-60

Church of Scientology International, Religious Technology Center & Church of
Scientology Celebrity Centre International, *Petitioners*,

v.

Chrissie Carnell Bixler, Cedric Bixler-Zavala, Jane Doe #1 & Jane Doe #2,
Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the AMICUS CURIAE BRIEF OF THE CHURCH LAW INSTITUTE contains 1,190 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 August 19, 2022

/s/ Larry L. Crain