

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 22-824

THE SYNOD OF BISHOPS OF THE RUSSIAN ORTHODOX
CHURCH OUTSIDE OF RUSSIA, ET AL.,

Petitioners,

v.

ALEXANDER BELYA,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Gordon D. Todd, certify that the amicus brief in the foregoing case contains 5,589 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 March 31, 2023.

/s/ Gordon D. Todd

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