In the Supreme Court of the United States

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

Petitioners,

V.

ALEXANDER BELYA,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Andrew N. Ferguson, a member of the bar of this Court, certify that the accompanying Brief of the Commonwealth of Virginia and 18 Other States as *Amici Curiae* in Support of Petitioners contains 4,633 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on March 31, 2023.

/s/ Andrew N. Ferguson

ANDREW N. FERGUSON
SOLICITOR GENERAL
VIRGINIA OFFICE OF THE ATTORNEY GENERAL
202 North Ninth Street
Richmond, Virginia 23219
(804) 786-7704
AFerguson@oag.state.va.us
SolicitorGeneral@oag.state.va.us