

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 23-156

Speech First, Inc.,

*Petitioner,*

v.

Timothy Sands, individually and in his official capacity as President of the Virginia  
Polytechnic Institute and State University,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Gordon D. Todd, certify that the Brief Of Amici Curiae Alliance Defending Freedom And The Manhattan Institute In Support Of Petitioner in the foregoing case contains 5,959 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 September 18, 2023.

/s/ Gordon D. Todd  
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