

CERTIFICATE OF COMPLIANCE

No. 23-179

ALASKA, ET AL.,

Petitioners,

v.

ALASKA STATE EMPLOYEES ASSOCIATION/AMERICAN
FEDERATION OF STATE, COUNTY AND MUNICIPAL
EMPLOYEES LOCAL 52, AFL-CIO,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Protect the First Foundation as *Amicus Curiae* Supporting Petitioners contains 1,870 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio
County of Hamilton

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 29, 2023.

Emily Mullins
Becker Gallagher Legal Publishing, Inc.
8790 Governor's Hill Drive, Suite 102
Cincinnati, OH 45249
(800) 890-5001

Sworn to and subscribed before me by said Affiant on the date designated below.

Date: _____

Notary Public

[seal]