## Debra A. Vitagliano v. County of Westchester, New York

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae of The Claremont Institute's Center for Constitutional Jurisprudence in support of Petitioners contains 4,233 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 24, 2023.

ANTHONY T. CASO