

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amici Curiae* of the National Legal Foundation, *et al.*, supporting granting the Petition in No. 23-833, *Greenberg v. Lehocky, et al.* contains 3,915 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

March 4, 2024

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