

CERTIFICATE OF COMPLIANCE
No. 23-914

IN THE
Supreme Court of the United States

DIANE ZILKA,


Petitioner,

v.

CITY OF PHILADELPHIA, TAX REVIEW BOARD,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* National Taxpayers Union Foundation in Support of Petitioner in the above-entitled case contains 1,873 words, as measured by the word processing software and excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I, Joseph D. Henschman, declare under penalty of perjury that the foregoing is true and correct. Executed on March 25, 2024.



JOSEPH D. HENCHMAN

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