

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

No. 24-1327

SPIRIT OF ALOHA TEMPLE, A HAWAII  
NONPROFIT CORPORATION, ET AL.,

*Petitioners,*

v.

MAUI COUNTY, HAWAII, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I, Gordon D. Todd, certify that the Brief of *Amicus Curiae* Jewish Coalition for Religious Liberty in Support of Petitioners in the foregoing case contains 5,278 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 July 30, 2025.

/s/ Gordon D. Todd  
GORDON D. TODD  
SIDLEY AUSTIN, LLP  
1501 K Street N.W.  
Washington, D.C. 20005  
(202) 736-8760  
gtodd@sidley.com