



CERTIFICATE OF COMPLIANCE

Nos. 17-1717, 18-18

THE AMERICAN LEGION, *et al.*,
Petitioners,

v.

AMERICAN HUMANIST ASSOCIATION, *et al.*,
Respondents.

MARYLAND-NATIONAL CAPITAL PARK AND PLANNING
COMMISSION,
Petitioner,

v.

AMERICAN HUMANIST ASSOCIATION, *et al.*,
Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of the National Jewish Commission on Law and Public Affairs (“COLPA”) and Other Orthodox Jewish Organizations in Support of Petitioners contains 1,412 words, excluding the parts of the Brief 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 December 21, 2018.

Julie A. Kershner

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

Date: December 21, 2018

John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023