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December 21, 2018

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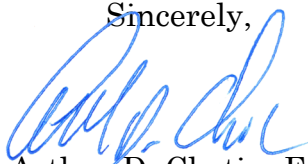
RE: NO. 17-1717: THE AMERICAN LEGION, ET AL. V. AMERICAN HUMANIST ASSOCIATION, ET AL.
NO. 18-18: MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION V. AMERICAN HUMANIST ASSOCIATION, ET AL.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Judicial Watch, Inc. in Support of Petitioners referenced above contains **5,240** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Arthur D. Chotin, Esq.
Principal