

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

Nos. 17-1717 & 18-18

The American Legion, et al.,

Petitioners,

v.

American Humanist Society, et al.,

Respondents.

Maryland-National Capital Park and Planning Commission,

Petitioner,

v.

American Humanist Society, et al.,

Respondents.

As required by Supreme Court Rule 33.1(h), I, Paul J. Zidlicky, certify that the Brief of International Municipal Lawyers Association, National Association of Counties, National League of Cities, International City/County Management Association, and Government Finance Officers Association as *Amici Curiae* in Support of Petitioners in the foregoing case contains 7,332 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 December 21, 2018.

/s/ Paul J. Zidlicky
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